

HIGHLY CONFIDENTIAL

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: FACEBOOK, INC., MDL No. 2843  
CONSUMER USER PROFILE Case No.  
LITIGATION 18-md-02843-VC-JSC

-----  
This document relates to:  
ALL ACTIONS  
-----

\*\*HIGHLY CONFIDENTIAL\*\*

ZOOM DEPOSITION OF FACEBOOK's 30(b)(6)  
CORPORATE REPRESENTATIVE - MICHAEL FAHEY  
(Reported Remotely via Video & Web Videoconference)  
Steamboat Springs, Colorado (Deponent's location)  
Thursday, July 21, 2022  
Volume 1

**REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED**

STENOGRAPHICALLY REPORTED BY:  
REBECCA L. ROMANO, RPR, CSR, CCR  
California CSR No. 12546  
Nevada CCR No. 827  
Oregon CSR No. 20-0466  
Washington CCR No. 3491  
JOB NO. 5300517  
PAGES 1 - 113

Page 1

HIGHLY CONFIDENTIAL

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: FACEBOOK, INC., MDL No. 2843  
CONSUMER USER PROFILE Case No.  
LITIGATION 18-md-02843-VC-JSC

-----  
This document relates to:  
ALL ACTIONS  
-----

DEPOSITION OF MICHAEL FAHEY, taken on  
behalf of the Plaintiffs, with the deponent located  
in Steamboat Springs, Colorado, commencing at  
10:19 a.m., Thursday, July 21, 2022, remotely  
reported via Video & Web videoconference before  
REBECCA L. ROMANO, a Certified Shorthand Reporter,  
Certified Court Reporter, Registered Professional  
Reporter.

HIGHLY CONFIDENTIAL

APPEARANCES OF COUNSEL

(All parties appearing via Web videoconference)

For the Plaintiffs:

KELLER ROHRBACK L.L.P.

BY: BENJAMIN GOULD

BY: DEREK W. LOESER

BY: CARI CAMPEN LAUFENBERG

BY: ADELE DANIEL

Attorneys at Law

1201 Third Avenue

Suite 3200

Seattle, Washington 98101

(206) 623-1900

bgould@kellerrohrback.com

dloeser@kellerrohrback.com

claufenberg@kellerrohrback.com

adaniel@kellerrohrback.com

/////

HIGHLY CONFIDENTIAL

APPEARANCES OF COUNSEL

(All parties appearing via Web videoconference)

For the Plaintiffs:

KELLER ROHRBACK L.L.P.

BY: CHRIS SPRINGER

Attorney at Law

801 Garden Street

Suite 301

Santa Barbara, California 93101

(805) 456-1496

cspringer@kellerrohrback.com

For Facebook, Inc.:

GIBSON, DUNN & CRUTCHER LLP

BY: AUSTIN V. SCHWING

BY: ROSEMARIE T. RING

Attorneys at Law

555 Mission Street

Suite 3000

San Francisco, California 94105-0921

(415) 393-8200

aschwing@gibsondunn.com

rring@gibsondunn.com

/////

HIGHLY CONFIDENTIAL

1 APPEARANCES OF COUNSEL (cont'd)  
2 (All parties appearing via Web videoconference)  
3

4 For Facebook, Inc.:

5 GIBSON, DUNN & CRUTCHER LLP

6 BY: CASSARAH M. CHU

7 BY: KELLY E. HERBERT

8 BY: MICHAEL McQUEENEY

9 Attorneys at Law

10 200 Park Avenue

11 New York, New York 10166-0193

12 (212) 351-6381

13 cmchu@gibsondunn.com

14 kherbert@gibsondunn.com

15 mmcqueeney@gibsondunn.com

16 and

17 BY: SHAQUILLE GRANT

18 Attorney at Law

19 2001 Ross Avenue

20 Suite 2100

21 Dallas, Texas 75201

22 (214) 698-3206

23 sgrant@gibsondunn.com

24

25 /////

Page 5

HIGHLY CONFIDENTIAL

1 APPEARANCES OF COUNSEL (cont'd)  
2 (All parties appearing via Web videoconference)

3

4 For Facebook, Inc.:

5 GIBSON, DUNN & CRUTCHER LLP

6 BY: FELISHA R. MILES

7 Attorney at Law

8 333 South Grand Avenue

9 Los Angeles, California 90071-3197

10 (213) 229-7523

11 fmiles@gibsondunn.com

12

13 JAMS

14 BY: DANIEL B. GARRIE

15 Special Master

16 555 W. 5th Street

17 32nd Floor

18 Los Angeles, California 90013

19 (213) 253-9706

20 dgarrie@jamsadr.com

21

22 ALSO PRESENT:

23 Francine Bendat, Associate General Counsel,  
24 Meta Platforms

25 John Macdonell, Videographer

Page 6

HIGHLY CONFIDENTIAL

## I N D E X

DEPONENT	EXAMINATION
MICHAEL FAHEY	PAGE
VOLUME 1	

BY MR. GOULD	12
--------------	----

## E X H I B I T S

NUMBER		PAGE
--------	--	------

## DESCRIPTION

Exhibit 619	Native Excel Spreadsheet, FB-CA-MDL-03959476;	19
-------------	--	----

Exhibit 620	Native Excel Spreadsheet, FB-CA-MDL-03959477;	25
-------------	--	----

Exhibit 621	Native Excel Spreadsheet, FB-CA-MDL-03962689;	45
-------------	--	----

Exhibit 622	Native Excel Spreadsheet, FB-CA-MDL-03962690;	56
-------------	--	----

Exhibit 623	Native Excel Spreadsheet FB-CA-MDL-03962691;	61
-------------	---	----

/////

Page 7

HIGHLY CONFIDENTIAL

1	E X H I B I T S (cont'd)		
2	NUMBER		PAGE
3	DESCRIPTION		
4	Exhibit 624	Native Excel Spreadsheet	63
5		FB-CA-MDL-03970356;	
6			
7	Exhibit 625	Native Excel Spreadsheet,	67
8		FB-CA-MDL-03962693;	
9			
10	Exhibit 626	Native Excel Spreadsheet,	70
11		FB-CA-MDL-03962694;	
12			
13	Exhibit 627	Native Excel Spreadsheet,	73
14		FB-CA-MDL-03962695;	
15			
16			
17	PREVIOUSLY MARKED EXHIBITS		
18	NUMBER		PAGE
19	Exhibit 330		13
20			
21			
22			
23			
24			
25	/////		



## HIGHLY CONFIDENTIAL

1 Steamboat Springs, Colorado; 09:04:04

2 Thursday, July 21, 2022

3 10:19 a.m.

4 ---o0o---

5

6 THE VIDEOGRAPHER: Okay. We're on the

7 record. It's 10:19 a.m. Mountain Time on

8 July 21st, 2022.

9 This is the deposition of Michael Fahey.

10 We're here in the matter of Facebook Consumer 10:19:39

11 Privacy User Profile Litigation.

12 I'm John Macdonell, the videographer,

13 with Veritext.

14 Before the reporter swears the witness,

15 would counsel please identify themselves, beginning 10:19:51

16 with the noticing attorney, please.

17 MR. GOULD: For the plaintiffs and the

18 proposed class, Benjamin Gould with

19 Keller Rohrbach.

20 And with me today is Chris Springer, also 10:20:03

21 of Keller Rohrbach.

22 MR. SCHWING: Austin Schwing,

23 Gibson, Dunn & Crutcher for the defendant.

24 I am joined by Cassarah Chu,

25 Kelly Herbert, Shaquille Grant, Rose Ring. 10:20:23

Page 9

HIGHLY CONFIDENTIAL

1 Francine Bendat, who is with Meta. 10:20:26

2 Michael McQueeney, Felisha Miles.

3 I also note that there's a video one and

4 a video two showing on our screen. Is -- that's

5 related to the court reporter? 10:20:40

6 THE VIDEOGRAPHER: That -- that's me, the

7 videographer.

8 MR. SCHWING: Okay.

9 THE VIDEOGRAPHER: Just capturing

10 devices, yeah. 10:20:45

11 MR. SCHWING: Okay. Thank you.

12 SPECIAL MASTER GARRIE: And

13 Special Master Garrie here on behalf of the Court.

14 THE COURT REPORTER: At this time, I will

15 ask counsel to agree on the record that there is no 10:20:54

16 objection to this deposition officer administering

17 a binding oath to the deponent via remote

18 videoconference, starting with the noticing

19 attorney, please.

20 MR. GOULD: No objection. 10:21:11

21 MR. SCHWING: No objection.

22 THE COURT REPORTER: Mr. Fahey, If you

23 could raise your right hand for me, please.

24 THE DEPONENT: (Complies.)

25 THE COURT REPORTER: You do solemnly 10:21:14

Page 10

HIGHLY CONFIDENTIAL

1 state, under penalty of perjury, that the testimony 10:21:14  
2 you are about to give in this deposition shall be  
3 the truth, the whole truth and nothing but the  
4 truth?

5 THE DEPONENT: I do. 10:21:14

6

7

8

9

10 10:21:14

11

12

13

14

15 10:21:14

16

17

18

19

20 10:21:14

21

22

23

24

25 ///// 10:21:14

Page 11

HIGHLY CONFIDENTIAL

1 MICHAEL FAHEY, 10:21:32  
2 having been administered an oath, was examined and  
3 testified as follows:  
4

5 EXAMINATION 10:21:32  
6 BY MR. GOULD:

7 Q. Good morning, Mr. Fahey.

8 My name is Benjamin Gould, and I'll be  
9 taking your deposition today. Try to get through  
10 this as quickly as possible. 10:21:44

11 Just a few ground rules. You know it's  
12 important that we not talk over each so we have a  
13 clean record. If you don't understand a question,  
14 please let me know.

15 I will probably be asking you -- and 10:21:58  
16 this -- I told other witnesses this in this case --  
17 you know, at times I'll be asking you like what  
18 seem like insanely stupid questions.

19 But I don't mean that to like insult your  
20 intelligence. This is sort of just what we have to 10:22:14  
21 do in the law to -- to -- to establish facts and --  
22 and things like that.

23 So I wanted you to be prepared for that  
24 just so you don't feel like insulted or surprised,  
25 or whatever. 10:22:28

Page 12

## HIGHLY CONFIDENTIAL

1 I wanted -- now I think we should start 10:22:28

2 with previously marked Exhibit 330.

3 Q. (By Mr. Gould) If you could call that up

4 on your Exhibit Share screen, Mr. Fahey, and go to

5 the very bottom, when you're there, of page 14. 10:22:43

6 Let me know when you're there.

7 A. I'm there.

8 Q. Okay. So topic 9a reads "Video content

9 and information relating to video content,

10 requested or obtained, available to or accessed, 10:23:04

11 interacted with, or shared by users on or via the"

12 platform -- "Facebook Platform, specifically:

13 A. The amount of such content and how the amount of

14 such content has changed or varied over time."

15 You understand that you are testifying on 10:23:24

16 behalf of Facebook about subtopic a, the -- the --

17 the words that are right next to that -- to that

18 little a there, yes?

19 A. Yes, I do.

20 Q. Okay. And is there any portion of that 10:23:37

21 subtopic that is unclear to you?

22 A. No, I don't believe so.

23 Q. Okay. And so you're -- you realize

24 you're testifying on behalf of Facebook, yes?

25 You're not testifying in your individual 10:23:55

HIGHLY CONFIDENTIAL

1 capacity? 10:23:57

2 A. If by Facebook you mean Meta, yes, I do.

3 Q. Thank you. Thank you for the correction,  
4 yes.

5 And do you understand that your testimony 10:24:08  
6 is intended here to cover the time period  
7 January 1, 2007, to the present, unless we are  
8 specifying some other range?

9 A. Yes.

10 Q. Okay. Obviously, that is a long period 10:24:34  
11 and a lot of -- has happened to the artist formally  
12 known as Facebook, now Meta. So I will try to be  
13 as specific in my questioning as I can. If I'm  
14 not, I hope you will point out that the -- the time  
15 period about which you are talking specifically. 10:24:57

16 So what did you do to prepare for this  
17 deposition?

18 A. I spoke with a handful of people on the  
19 topic. I reviewed a set of press releases, and I  
20 also looked at a set of charts. 10:25:17

21 Q. And were some of the people you spoke  
22 with former or current Meta employees?

23 A. I only spoke with current Meta employees.

24 Q. Okay. Would you -- would you mind,  
25 because I'm going to -- I'm -- I'm going to slip 10:25:39

Page 14

HIGHLY CONFIDENTIAL

1 otherwise. 10:25:45

2 Would you mind if we just referred to  
3 Meta as Facebook for the purposes of this  
4 deposition?

5 A. I -- I have no issues with that. The 10:25:52  
6 only reason why I clarified is I have a role within  
7 the company where my role is actually attached to  
8 what is now called Facebook, and I did not want to  
9 get that confused.

10 Q. Do you mean what is now called Meta? 10:26:06

11 A. Yeah. So there's the company which is  
12 Meta --

13 Q. Got it.

14 A. -- and then within the company is  
15 Facebook. And because the business unit I am 10:26:13  
16 within is Facebook, I did not want there to be  
17 confusion at a future point in time.

18 Q. Okay. Great.

19 Like I said, I will just refer to  
20 everything that's under the umbrella of Meta as 10:26:30  
21 Facebook, unless I tell you otherwise.

22 Who -- excuse me -- which current  
23 employees of Facebook did you speak with?

24 A. I spoke with a gentleman named  
25 Cayman Simpson. Another gentle- -- gentleman named 10:26:53

Page 15

HIGHLY CONFIDENTIAL

1 Yondy Kang. I spoke with Amanda Yin. Fan Wu. 10:26:57

2 Shweta Metkar (phonetic). And Maggie Gee.

3 Q. And you're aware we provided documents to  
4 your counsel at Gibson Dunn in advance of this  
5 deposition? 10:27:18

6 A. Yes, I'm aware.

7 Q. And did you -- did you personally review  
8 any of those documents in -- in advance of this  
9 deposition?

10 A. Yes. 10:27:28

11 Q. Okay. Do you remember which ones?

12 A. I do not. I -- I scanned through all of  
13 them and really reviewed them to make sure that  
14 they related to the topic at hand.

15 Q. Okay. We can probably move on here. 10:27:42

16 What is your current position at  
17 Facebook?

18 A. I support data engineering for Facebook  
19 application within -- within Facebook.

20 Q. And what is data engineering? 10:28:08

21 A. Data engineering is the team responsible  
22 for measuring what happens on the application and  
23 taking that measurement and putting it into systems  
24 for the purpose of product analytics.

25 Q. How long have you been in that position? 10:28:32

Page 16



## HIGHLY CONFIDENTIAL

1 A. Four and a half years. 10:28:36

2 Q. Wow. Okay.

3 And before that were you in any position

4 related to the measuring of what goes on, on the

5 Facebook Platform? 10:28:52

6 A. No.

7 Q. Okay. What was your -- let's just start

8 here.

9 What was your immediately prior position

10 to the position you have now? 10:29:00

11 A. The immediately prior position was data

12 engineering also. But supporting the sales and

13 marketing team --

14 Q. Okay.

15 A. -- at Facebook. 10:29:12

16 Q. And what were like the approximate dates

17 that you held that position?

18 A. Approximately October 2014 to -- I'm

19 going to get the math wrong here -- January of

20 200- -- I'm going to say 2018, but I often get it 10:29:35

21 confused. It's either 2018 or 2017.

22 Q. You have had, though, a position within

23 data engineering at Facebook since 2014, yes?

24 A. That's correct.

25 Q. Okay. And then before the position that 10:29:47

HIGHLY CONFIDENTIAL

1 we just spoke about, that you started in 2014, what 10:29:51  
2 position did you hold before that?

3 A. I was a principal in a consulting firm.

4 MR. GOULD: Okay. Fabulous. Okay.

5 Thanks. 10:30:05

6 Okay. Chris, let's go to Bates  
7 number -9476.

8 MR. SPRINGER: One moment, please.

9 MR. GOULD: Of course.

10 MR. SCHWING: Mr. Fahey, I'll let you in 10:30:32  
11 on a tip for the document share --

12 THE DEPONENT: Yes.

13 MR. SCHWING: -- which is, a lot of times  
14 the documents, when they get loaded, they don't  
15 immediately show up. And so if you click the 10:30:45  
16 refresh button within your browser, sometimes the  
17 documents will -- will appear.

18 THE DEPONENT: Gotcha. Okay. I'm  
19 still -- at this point, I'm still waiting. I still  
20 just see Exhibit 330. 10:30:58

21 MR. GOULD: Yeah, me, too. I think  
22 Mr. Springer will let us know.

23 And, Mr. Springer, again, when you have  
24 time -- I know you're uploading one document now --  
25 if you could also upload Bates number -9477, that 10:31:15

Page 18

HIGHLY CONFIDENTIAL

1 would be great. 10:31:26

2 (Exhibit 619 was marked for  
3 identification by the court reporter and is  
4 attached hereto.)

5 MR. SPRINGER: Got it. 10:31:31

6 The first document has been introduced as  
7 Exhibit 619.

8 Q. (By Mr. Gould) Okay. So that should be  
9 showing up, and let me know when it's up for you,  
10 Mr. Fahey. 10:31:46

11 A. I have it up.

12 Q. Okay. Fabulous.

13 And did you review this document in  
14 advance of this deposition?

15 A. I did. 10:31:52

16 Q. Okay. Let -- let me just ask you a  
17 couple of preliminary questions just so -- because  
18 I don't want to waste your or anyone's time.

19 Are you prepared today to testify about  
20 what drove changes in these numbers? 10:32:05

21 MR. SCHWING: Object to form.

22 THE DEPONENT: When you say "drove  
23 changes," I -- I wouldn't necessarily know exactly  
24 what you mean there. Could you --

25 Q. (By Mr. Gould) Sure. Of course. 10:32:29

Page 19

HIGHLY CONFIDENTIAL

1 A. -- be a little bit more specific. 10:32:31

2 Q. Fair to say that a lot of the numbers  
3 we're going to be talking about today, numbers that  
4 you reviewed in advance of this deposition, went up  
5 and down, yes? 10:32:42

6 A. Yes, the numbers changed.

7 Q. Those are the kinds of changes I am  
8 talking about.

9 And by "drive," I just am talking about  
10 what caused them to go up and down. 10:32:55

11 Does that clarify sufficiently for you  
12 what I'm talking about?

13 MR. SCHWING: Object to form.

14 Q. (By Mr. Gould) All I'm asking is whether  
15 you understand what I mean. That's all. 10:33:08

16 A. I understand what you mean by drive, yes.

17 Q. Okay. Great.

18 So -- and, again, this is so that we're  
19 not wasting time.

20 Are you prepared today to testify about 10:33:21  
21 what drove changes in the numbers we're going to be  
22 talking about today?

23 MR. SCHWING: Object to form.

24 THE DEPONENT: I feel comfortable talking  
25 about the numbers as they're presented. My area of 10:33:37

Page 20

## HIGHLY CONFIDENTIAL

1 expertise is not product strategy or -- or anything 10:33:42

2 else --

3 Q. (By Mr. Gould) Okay.

4 A. -- that might -- might have had -- had an  
5 impact on how the numbers changed. 10:33:52

6 MR. GOULD: That is super helpful.

7 That's great.

8 I just wanted to say, for the record,  
9 that -- that Mr. -- Mr. Schwing, we'll expect that  
10 the -- the witness designated to testify on 10:34:01  
11 subtopic c will be able to testify on what drove  
12 changes in the numbers.

13 Q. (By Mr. Gould) I want to direct your  
14 attention, Mr. Fahey, again to the -- to the  
15 spreadsheet that's open here. 10:34:18

16 Are -- are you prepared to testify about  
17 the resources that Facebook devotes to keeping  
18 track of this data?

19 MR. SCHWING: Object to form.

20 THE DEPONENT: Again, what I -- what I 10:34:46  
21 prepared for was to talk about the numbers.

22 Q. (By Mr. Gould) In other words, you're  
23 prepared -- oh, sorry. Go ahead.

24 A. No, please, go ahead.

25 Q. In other words, you're prepared to talk 10:34:58

HIGHLY CONFIDENTIAL

1 about the numbers themselves? 10:34:59

2 A. Correct.

3 Q. And not the resources that Facebook  
4 devotes to keeping track of those numbers?

5 MR. SCHWING: Object -- object to form. 10:35:14

6 THE DEPONENT: I think when you say  
7 resources to keep track of, I think that's --  
8 that's a very broad topic and --

9 Q. (By Mr. Gould) Sure.

10 A. -- I would not be the person to talk to 10:35:27  
11 about the resources because I just wouldn't be able  
12 to speculate or guess.

13 MR. GOULD: Great. Okay. Super helpful.

14 Again, Mr. Schwing, just for the record,  
15 I will expect that the witness designated to 10:35:40  
16 testify on subtopic c will be prepared to testify  
17 about -- about that.

18 MR. SCHWING: Well, let -- let me pause  
19 here to -- if we could, to just make sure that we  
20 have some clarity. 10:35:53

21 I think the Special Master indicated  
22 earlier it's helpful if we talk about, you know,  
23 which -- which witness will cover what.

24 Mr. Fahey, I believe, can speak to,  
25 you know, the -- the -- the infrastructure that's 10:36:04

Page 22

HIGHLY CONFIDENTIAL

1 used to store the -- you know, and -- and track 10:36:08  
2 this information.

3 And, you know -- you know, what -- what

4 [REDACTED]

5 are stored, and I think perhaps what you were 10:36:21  
6 asking related to that. So Mr. Fahey would be the  
7 right person to ask --

8 MR. GOULD: Fabulous.

9 MR. SCHWING: -- that question.

10 MR. GOULD: Thank you, Mr. Schwing. 10:36:32

11 MR. SCHWING: I -- I think there may have  
12 been just some confusion about what -- what it is  
13 you were after.

14 Q. (By Mr. Gould) Okay. Again, let's --  
15 let's go back to this -- to this spreadsheet here. 10:36:39

16 Fair to say that this spreadsheet --

17 MR. GOULD: Mr. Springer, can you remind  
18 me what the exhibit number for this is.

19 MR. SPRINGER: 619.

20 Q. (By Mr. Gould) Okay. I'll just refer to 10:37:01  
21 it as Exhibit 619, Mr. Fahey.

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

Page 23



\_\_\_\_\_

10:38:49



HIGHLY CONFIDENTIAL

1

■

■

■

■

■

■

■

■

■

■

■

■

14

Okay. Great.

15

A. No. That's quite all right.

10:39:59

16

MR. GOULD: Let's go on to the next

17

exhibit, which I presume is marked 620.

18

(Exhibit 620 was marked for

19

identification by the court reporter and is

20

attached hereto.)

10:40:05

21

MR. GOULD: Let me see here. Yeah.

22

Q. (By Mr. Gould) And let me know when you

23

have that up.

24

A. It's up right now, yes.

25

Q. Fabulous. Okay.

10:40:24

Page 25

HIGHLY CONFIDENTIAL

1 This document, Exhibit 620, did you 10:40:30  
2 review it in preparation for this deposition?

3 A. Yes, I did.

4 Q. And just to clarify, both this exhibit  
5 and the previous exhibit, these were prepared by 10:40:39  
6 Facebook employees.

7 They were -- these documents were created  
8 by Facebook employees, I assume?

9 A. I was not directly involved in the  
10 creation of the documents. So I would only be 10:40:55  
11 speculating as to who -- who created them or how  
12 they were created.

13 Q. They were created, though, by somebody at  
14 Facebook, yes?

15 A. They would have to have been, yes. 10:41:07

16 Q. Okay. Fabulous.

17 Any reason to think that the data in  
18 these spreadsheets is -- doesn't reflect the actual  
19 data that Facebook has?

20 A. No. 10:41:21

21 Q. Okay. Fabulous. That's what I'm  
22 wondering.

23 So again, in this exhibit, there appears

24 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Page 27

HIGHLY CONFIDENTIAL

1

2

3

4

5

6

7

8

MR. SCHWING: Object to form.

9

10

THE DEPONENT: That's actually not my area of expertise. So -- so I wouldn't -- I

10:43:49

11

wouldn't be comfortable, you know, really

12

speculating in that area at all.

13

14

Q. (By Mr. Gould) Who at Facebook do you

think would know that question -- the answer to

15

that question?

10:44:02

16

A. I honestly would not know.

17

18

Q. Okay. Are you familiar with how these

documents -- well, excuse me.

19

20

Are you familiar with the general process

for how these documents, this spreadsheet and the

10:44:26

21

previous one were created?

22

A. I am.

23

24

Q. And how -- can you describe that process

for me.

25

[illegible]

HIGHLY CONFIDENTIAL

1

■

■

■

■

■

■

■

■

■

■

■

■

■

■

■

■

18

MR. SCHWING: Object to form.

19

THE DEPONENT: Yeah. Again, I -- I --

20

I'd hesitate to put a label on it and that's why

10:48:05

21

I -- you know, maybe using casual language here is

22

problematic. I would just go back to the way I

23

explained it. I don't know that I'd be comfortable

24

summarizing it.

25

Q. (By Mr. Gould) And here I'm just trying

10:48:23

Page 30

HIGHLY CONFIDENTIAL

1 to make sure I understand. 10:48:25

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

[REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

[REDACTED]

11 [REDACTED]

12 MR. SCHWING: It's vague.

13 THE DEPONENT: Would you maybe --

14 Q. (By Mr. Gould) Sure.

15 A. Yeah.

10:49:44

16 Q. Here's another way of asking it. I'm

17 sorry.

18 [REDACTED]

19 [REDACTED]

20 MR. SCHWING: Object to form.

10:49:55

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

[REDACTED]

Page 31

HIGHLY CONFIDENTIAL

1

█

█

4

MR. SCHWING: Vague.

5

█

█

8

Maybe you could give me a more

9

specific --

10

Q. (By Mr. Gould) Sure.

10:51:04

11

A. -- with what would be Meta.

12

█

█

█

█

█

18

█

█

█

22

MR. SCHWING: Object to form.

23

THE DEPONENT: I think I understand what

24

you're saying.

25



HIGHLY CONFIDENTIAL

1

[REDACTED]

[REDACTED]

2

[REDACTED]

3

[REDACTED]

4

[REDACTED]

[REDACTED]

[REDACTED]

5

[REDACTED]

10:52:32

6

A. I'm sorry. What was the word right

7

before --

8

[REDACTED]

[REDACTED]

9

A. Yeah, I understand.

10

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Page 33

HIGHLY CONFIDENTIAL

1

█

█

█

5

Q. I see.

10:54:24

6

7

Then perhaps a better way of answering my  
question then would be to say -- or to ask you, the

█

█

█

█

█

█

█

█

16

MR. SCHWING: Object to form.

█

█

█

█

█

22

Q. (By Mr. Gould) Forgive me --

23

A. For sure.

█

█

HIGHLY CONFIDENTIAL

1

█

█

█

█

█

█

█

█

█

█

█

█

█

█

█

17

MR. SCHWING: Vague.

█

█

█

█

█

█

█

█

HIGHLY CONFIDENTIAL

1

█

█

█

█

█

█

8

Okay?

9

A. (Deponent nods head.)

█

█

█

█

█

█

16

Q. Great.

17

And I will use the term -- and I don't

18

know if it's the correct technical term. But I

19

20

which these produced numbers are based.

21

Do you at least understand sort of what

22

I'm getting at by that term?

23

A. I do.

24

Q. Okay. Fabulous.

25

10:59:14

10:59:33

Page 36

HIGHLY CONFIDENTIAL

1

2

3

4

MR. SCHWING: Object to form.

5

THE DEPONENT: So I think what you're

11:00:30

6

asking me is, what is the system or the process

7

that --

8

Q. (By Mr. Gould) Let's start there.

9

A. -- that's taking place?

10

Q. Let's start there.

11:00:42

11

12

13

14

15

16

Q. Okay. And so it sounds to me like there

17

18

19

20

21

22

23

24

25

HIGHLY CONFIDENTIAL

1

█

█

█

█

█

█

█

█

█

█

█

█

█

15

MR. SCHWING: Objection. Vague.

11:02:52

█

█

█

█

█

█

█

23

MR. SCHWING: Objection. Vague.

24

I -- I don't want to -- it's -- it's

25

compound, Ben.

11:03:54

Page 38

HIGHLY CONFIDENTIAL

1 Do you want to take them like one at a 11:03:56

2 time? I just -- I want to make sure he can answer.

3 MR. GOULD: Okay.

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 A. So we're looking at -9477 now, correct,

8 620; is that right?

9 Q. Yeah. Let's start there.

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 Q. Okay. Fabulous.

18 Let's go back -- I believe we were just

19 talking about Exhibit 620, yes?

20 A. I think so. 11:05:01

21 Q. Okay. Let's go back to 619.

22 A. Okay.

23 Q. You carefully reviewed those numbers,

24 correct?

25 A. Yes. 11:05:11

Page 39

HIGHLY CONFIDENTIAL

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

MR. GOULD: Chris, I would like you to  
upload a whole bunch of files here. Let's start  
with -2689.

11:05:26

MR. SPRINGER: Okay.

MR. GOULD: And do you see where -- where  
I am, Chris?

MR. SPRINGER: Yes.

11:05:46

MR. SCHWING: Ben- --

MR. GOULD: So I want you to -- to --  
to --

MR. SCHWING: Ben- -- Benjamin, can I  
interrupt you for just -- I'm sorry -- for just one  
second.

11:05:50

While you're loading up a bunch of stuff,  
can we just take like a three-minute break. I have  
to let a contractor into my backyard --

MR. GOULD: Yeah, absolutely.

11:05:57

MR. SCHWING: Just five -- maybe five  
minutes and we can -- we'll break away and then  
we'll --

MR. GOULD: Yeah. That would actually be  
helpful. Thank you.

11:06:03

Page 40



## HIGHLY CONFIDENTIAL

1 MR. SCHWING: Sorry -- sorry about that. 11:06:05

2 Thank you. Appreciate it.

3 Let's go to the breakout room.

4 THE VIDEOGRAPHER: Okay. We're off the

5 record. It's 11:06 a.m. 11:06:09

6 (Recess taken.)

7 THE VIDEOGRAPHER: We're back on the

8 record. It's 11:13 a.m.

9 Q. (By Mr. Gould) Let me go back briefly to  
10 the two spreadsheets we have talked about earlier 11:13:50  
11 in this deposition, Exhibits 619 and 620.

■

■

14 correct?

15 A. Correct. 11:14:14

16 ■

■

18 A. Correct.

19 Q. If I am a Facebook user and I upload a  
20 video I took of my kids to my Facebook profile, I'm 11:14:24  
21 not uploading it via Facebook Messenger, am I?

22 A. No, you're uploading it via Facebook.

23 Q. Okay. If I am live streaming playing  
24 Call of Duty, I'm not doing that using Facebook  
25 Messenger, am I? 11:14:51

HIGHLY CONFIDENTIAL

1 A. No. 11:14:56

2 Q. Okay. If I'm an advertiser and I  
3 advertise using video, that video isn't uploaded  
4 via Facebook Messenger, is it?

5 A. No. 11:15:15

6 Q. Okay. All right. I have -- I have a  
7 whole bunch of other ones to go through. But...

8 I'm actually just trying to get -- get my  
9 head around like the proper nomenclature.

10 You said that if I'm a Facebook user and 11:15:36  
11 I'm uploading a video to my profile, I'd be  
12 uploading it via the Facebook Platform; is that  
13 correct?

14 A. That is the -- that is the verbiage that  
15 I tend to use. 11:15:50

16 Q. Okay.

17 A. I think -- I -- I -- maybe to help you a  
18 little bit. We have Facebook as an application.  
19 We also have Messenger as a separate application.  
20 So if you think about it on your, say, phone or 11:16:02  
21 your device, you're going to see two separate  
22 applications.

23 Q. Got it.

24 A. So whatever you're uploading through,  
25 you're in the Messenger application or you're in 11:16:12

Page 42

HIGHLY CONFIDENTIAL

1 the Facebook application. 11:16:15

2 Q. Got it. I see.

3 And organizations or groups that have  
4 Facebook pages, if they were to upload a video to  
5 that page, they're not uploading it via 11:16:25  
6 Facebook Messenger, right?

7 A. No.

8 Q. They're uploading it via the  
9 Facebook Platform?

10 A. They have a few ways to upload. 11:16:36

11 Q. How -- what -- what are those ways?

12 A. Creator Studio would be more than likely  
13 the most prominent. But there are also ways to  
14 upload videos directly to your page without going  
15 through Creator Studio. 11:16:53

16 Q. Is Creator Studio another -- another  
17 Facebook app?

18 A. I would consider it part of the  
19 Facebook Platform. But when you get into app,  
20 right, that's very much like a concept you would 11:17:15  
21 see on a phone or an iPad, or whatever. So it is  
22 an aspect of the Facebook Platform, I think, is --  
23 is a better way to think of it.

24 Q. Got it.

25 Okay. Again, I want to make sure that I 11:17:26

Page 43

HIGHLY CONFIDENTIAL

1 get everything correct. 11:17:31

2 Can you think of -- so we've -- we've

3 spoken about uploading videos via

4 Facebook Messenger. We've spoken about uploading

5 videos using the Facebook Platform, including by 11:17:45

6 this Creator Studio -- is that the correct -- or

7 studio creator?

8 A. Creator Studio.

9 Q. Creator Studio. Okay.

10 Are there other ways to upload video that 11:17:58

11 you know of to Facebook?

12 A. I'd be guessing, if I was going to

13 speculate beyond what I just said.

14 Q. Okay. Okay. Fair.

15 We'll get to that with another designee. 11:18:10

16 And do you know how Facebook delivers

17 video ads on behalf of advertisers?

18 MR. SCHWING: Object to scope.

19 THE DEPONENT: So the -- really the topic

20 that I prepared for was the metrics and the 11:18:41

21 numbers. So I don't -- I don't know that I could

22 get into any of that.

23 MR. GOULD: Okay. Okay. We'll cover

24 that with -- planning on covering that just -- I

25 want to state, for the record, with another 11:18:50

Page 44

HIGHLY CONFIDENTIAL

1       designee. 11:18:54

2           Q.     (By Mr. Gould)   Okay.   So let's go to  
3       Exhibit 621, Mr. Fahey.

4           A.     All right.

5           Q.     Let me know when you have that open. 11:19:06

6           A.     Yup.

7           Q.     Fabulous.

8                 So in the columns --

9           MR. SCHWING:   Mr. Gould, just before you  
10       get to the next question, you said "another 11:19:11  
11       designee."

12                 I just want to be clear we've identified  
13       that advertising questions should be directed to  
14       the advertising designees that we put forward as of  
15       those two -- the two witnesses over the next couple 11:19:19  
16       days. But you and I can chat about that further.

17           MR. GOULD:   I understand that to be your  
18       concern.

19           MR. SCHWING:   Okay.

20                 (Exhibit 621 was marked for 11:19:27  
21       identification by the court reporter and is  
22       attached hereto.)

23           Q.     (By Mr. Gould)   So let -- so what --  
24       let's see here. This is 621.

25                 Okay. This spreadsheet that's been 11:19:35

Page 45

HIGHLY CONFIDENTIAL

1 marked as Exhibit 621, the -- I'm going to go 11:19:37

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED] [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED] [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED] [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED] [REDACTED]

21 [REDACTED]

22 [REDACTED] [REDACTED]

23 [REDACTED] [REDACTED]

24 [REDACTED]

25 [REDACTED] [REDACTED]

HIGHLY CONFIDENTIAL

1

█

█

█

█

█

7

Q. Okay. That's super helpful. Thank you.

█

█

█

█

█

█

█

█

█

█

18

Q. Got it.

19

A. -- for the other sheet.

█

█

█

█

█

█

© 2006 The Authors

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

11/11/2019

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

114

11/11/2019

12

13

14

15

16

third-party apps.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

11/11/2019

21

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

11/11/2019



HIGHLY CONFIDENTIAL

1

3

MR. SCHWING: Vague.

4

THE DEPONENT: So you're asking me what

7

Q. (By Mr. Gould) Right.

8

A. That's not something I could -- I could

9

speak to because it's not really part of the

10

process.

11:24:54

11

Q. Got it.

15

A. Can you say that question again, please.

11:25:10

16

Q. Sure. Sure. Be happy to.

25

A. That -- that gets into --

11:25:51

HIGHLY CONFIDENTIAL

1 Q. Let me ask it differently. Sorry. 11:25:55

2 If I'm watching a video on Facebook, I'm

3 not watching it on -- or excuse me.

4 [REDACTED]

5 [REDACTED]

[REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 Q. Do you know who would be able to speak to

10 that?

11:26:16

11 A. Honestly --

12 MR. SCHWING: Sorry. Just give me a

13 second.

14 The question is vague.

15 [REDACTED]

[REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

[REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 A. I wouldn't be able to speculate if a

11:27:18

Page 50

HIGHLY CONFIDENTIAL

1

█

█

█

█

█

█

█

█

10

MR. SCHWING: Vague.

11:27:58

█

█

█

█

█

█

█

█

█

█

21

Q. Okay. Thank you.

22

Sorry. I didn't mean to spend too much

23

time on that, but that's very helpful to me.

█

25

correct?

11:28:54

Page 51

HIGHLY CONFIDENTIAL

1

2

3

4

MR. SCHWING: Compound.

5

THE DEPONENT: I'm sorry. Did somebody

11:29:14

6

say something?

7

MR. SCHWING: I said it's com- --

8

compound.

9

10

11

A. Again, I wasn't involved in how the --

12

the data was pulled. So all I can speak to is the

13

data that's on the --

14

Q. Okay.

15

A. -- on -- in the spreadsheet.

11:29:37

16

Q. And so similarly, you don't know whether

17

correct?

18

19

20

21

MR. SCHWING: Scope. Outside the scope.

22

Q. (By Mr. Gould) Let me step back then,

23

Mr. Fahey, because, again, I don't want to waste

24

anybody's time.

11:30:14

Page 52

HIGHLY CONFIDENTIAL

1 A. Sure. 11:30:15

2

3

4

5 MR. SCHWING: Vague. 11:30:27

6 THE DEPONENT: That is correct. I'm

7 prepared to talk about the numbers themselves.

8 MR. GOULD: Great. So, again, just for

9 the record, I'll be expecting your designee for

10 subtopic c to be able to talk about -- to talk 11:30:38

11 about that.

12 Q. (By Mr. Gould) So do you know whether

13 Facebook enables video content creators to keep

15 MR. SCHWING: I -- I think -- let's pause 11:30:50

16 on that.

17 I do think that the witness can generally

18 speak to the fact that -- you know, that there

19 are -- are metrics and that different kind of

20 general -- you know, kind of use cases, why things 11:30:59

21 are, you know, asked for. But I think your

22 question was just -- I just want to be helpful,

23 Mr. Gould, in terms of kind of the -- the scope

24 here.

25 MR. GOULD: Okay. 11:31:12

Page 53

HIGHLY CONFIDENTIAL

1 MR. SCHWING: You know, specific -- like 11:31:13  
2 it depends what you're asking exactly. He -- he's  
3 not going to know every metric ever pulled and --  
4 and why and how it was used because it's a giant  
5 business. But I do think he can generally speak 11:31:21  
6 to the -- the topic. So I want to -- I want to  
7 pause you there and let you explore that, if you'd  
8 like to.

9 Q. (By Mr. Gould) Okay. So does Facebook  
10 enable video content creators to keep track -- 11:31:36

11 [REDACTED]  
12 A. We enable content creators, through  
13 Creator Studio, to keep track of a set of metrics.

14 [REDACTED]  
15 there. But there is -- there are metrics related 11:31:51  
16 to watch time.

17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]  
26 [REDACTED]  
27 [REDACTED]  
28 [REDACTED]  
29 [REDACTED]  
30 [REDACTED]

HIGHLY CONFIDENTIAL

1

■

■

■

■

■

■

■

■

■

■

■

■

■

■

■

■

18

MR. SCHWING: Objection.

19

THE DEPONENT: Yeah. I -- I -- I

20

apologize. I'm very much a numbers person so I'm

11:33:48

21

hesitant to use adverbs and adjectives.

22

Q. (By Mr. Gould) Sure. Qualitative to

23

describe the quantitative?

24

A. Yeah.

25

MR. GOULD: Got it. Okay. Let's go on

11:33:59

Page 55

2                               (Exhibit 622 was marked for  
3       identification by the court reporter and is  
4       attached hereto.)

7 A. Yeah. Bear with me with one second.

11 622. Okay. I have it up.

15	A. Yes.	11:34:50
----	---------	----------

\_\_\_\_\_

Page 56





Veritext Legal Solutions  
866 299-5127

HIGHLY CONFIDENTIAL

1

3

4

6

9

11

12

13

14

15

16

17

18

19

21

22

23

24

25

A. I wouldn't be able to speak to -- to that. Again, I'm really only prepared to talk

Q. Sure.

A. Yes. My understanding is this is

Q. Okay. Let's go on to -- this is 622.

Let's go on to 623.

A. Before we move on -- you know, I just -- I wanted to flag something because you had asked me

Q. Yes. Thank you. Yes. Thank you. Yes.

A. I just didn't want you to think I was glossing over that.

Q. No, Mr. Fahey. Thank you. Thank you for pointing that out.

11:38:08

Page 58

HIGHLY CONFIDENTIAL

1

█

█

█

█

█

█

█

█

█

█

█

█

█

15

Q. And are you able to produce a spreadsheet

11:38:46

█

█

18

MR. GOULD: Okay. Mr. Schwing --

19

MR. SCHWING: Yes.

20

MR. GOULD: -- I would just respectfully

11:39:04

21

ask that -- that Facebook do so and produce it to

22

us, if it hasn't already.

23

MR. SCHWING: Yeah. And it may be

24

helpful to speak to Mr. Fahey about that. It -- I

25

think it depends on -- I'm -- I'm happy to speak

11:39:16

Page 59

HIGHLY CONFIDENTIAL

1

■

■

■

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

■

■

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

And you can ask Mr. Fahey more about that 11:39:34

now, if you would like to, but -- or we -- or we

can discuss it later. Whatever -- whatever makes

sense. But it's not the kind of thing that I can

just easily do. I think it may be --

(Simultaneously speaking.) 11:39:46

MR. GOULD: No, I'm not asking you today,

by any means.

MR. SCHWING: Well, or even -- it may be

difficult later even. We need to discuss the --

the specifics of it because I think it's a little 11:39:54

bit of a complex issue.

And so if you want to ask Mr. Fahey more

about it now, you can, or we can talk about it --

MR. GOULD: Okay.

MR. SCHWING: It's certainly not 11:40:02

something we can resolve right now.

MR. GOULD: Sure. Get it.

Q. (By Mr. Gould) So Mr. Fahey, on this

[REDACTED]

[REDACTED]

[REDACTED]

Page 60

HIGHLY CONFIDENTIAL

1

■

■

■

■

■

7

8

9

10

11

12

13

14

15

16

17

18

■

■

■

■

■

■

■

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

MR. GOULD: Okay. So that was 622, I

believe. I think -- yes.

(Exhibit 623 was marked for

identification by the court reporter and is

11:40:47

attached hereto.)

MR. GOULD: So let's move on to 623 --

Exhibit 623, Mr. Fahey.

This is Bates number -03962691.

Q. (By Mr. Gould) Mr. Fahey, did you review

11:41:04

this document in advance of the deposition today?

A. I did.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Page 61

HIGHLY CONFIDENTIAL

1

[REDACTED]

12

Let's leave it there for now.

[REDACTED]

22

Thank you.

[REDACTED]

HIGHLY CONFIDENTIAL

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

[REDACTED]

A. That is a very difficult question to answer as yes or no.

11:43:22

Q. Then -- then answer to your best -- the best of your ability.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

MR. GOULD: Okay. Okay. Moving on to the next exhibit.

(Exhibit 624 was marked for identification by the court reporter and is attached hereto.)

11:43:59

MR. GOULD: That would be 624, I believe. And that corresponds to Bates number -- for those of you following along -- -03970356.

11:44:14

Q. (By Mr. Gould) Mr. Fahey, did you review this document in advance of your deposition today?

A. I did.

Q. Okay. And the following question applies to both this spreadsheet and the rest of the

11:44:35

Page 63

HIGHLY CONFIDENTIAL

1 spreadsheets that we've seen today. 11:44:38

2

3

4

5 Q. Okay. Thank you. 11:44:43

6

7

8

9

10

11

12

13

14

15

16

17

18 Can you tell me what that captures?

19

20

21

22 So in other words, is this by -- by

23

24 you don't have to answer this question because I'm

25 going to put it in -- in a form that is admissible. 11:45:58

Page 64



HIGHLY CONFIDENTIAL

1 But the things that I am -- I am talking 11:46:01

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED] [REDACTED] [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 That's the sort of metric I'm talking

9 about.

10 [REDACTED] [REDACTED]

11 [REDACTED]

12 MR. SCHWING: I'm going to object to the

13 form with all the -- the lead-in. But maybe --

14 just to help you out maybe, Ben, like can -- give a

15 little explanation. Maybe it's helpful. 11:47:05

16 Do you want to start with a new question

17 so that he can answer it so I don't have to object

18 to it.

19 MR. GOULD: Sure.

20 MR. SCHWING: Okay. 11:47:11

21 [REDACTED] [REDACTED] [REDACTED]

22 [REDACTED]

23 [REDACTED] [REDACTED]

24 [REDACTED]

25 [REDACTED] [REDACTED]

Page 65

HIGHLY CONFIDENTIAL

1

█

█

█

█

█

█

█

█

█

11

Q. Anything else?

█

█

█

█

█

█

█

█

█

█

█

█

█

█

HIGHLY CONFIDENTIAL

1

2

A. That's correct. I can only speak of --

3

4

5

6

MR. GOULD: Moving on to I think -- was

7

that 624? I think it was.

8

(Exhibit 625 was marked for

9

identification by the court reporter and is

10

attached hereto.)

11:49:48

11

MR. GOULD: So moving on to 625, which is

12

Bates number -03962693.

13

Q. (By Mr. Gould) There are two columns

14

here.

15

16

17

18

19

20

21

22

23

24

25

HIGHLY CONFIDENTIAL

1

■

■

■

■

■

■

■

■

■

■

12

13

14

15

16

17

18

19

20

■

■

23

■

■

[REDACTED]

■

[REDACTED]

[REDACTED]

■

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q. And a video that is recorded using that

live button, it can, after it's recording, be

uploaded to the Facebook Platform to be viewed on

demand, if the content creator so wishes?

11:51:25

A. If the content creator wishes, they

can -- at the conclusion of streaming, they can

choose to save. They can choose to share.

They can -- they can -- they can choose to put it

on the platform.

11:51:47

■

[REDACTED]

[REDACTED]

A. Give me one second here.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Page 68

HIGHLY CONFIDENTIAL

1

2

3

4

5

Q. Okay. The way that Facebook gathers this

11:52:17

6

data is, broadly speaking, the same process we've

7

spoken about earlier, correct?

8

A. Correct.

9

10

11

12

13

14

15

16

Q. Okay. Let's go back to 624.

17

18

A. Okay.

19

Q. Okay. So similar questions, in producing

20

21

22

23

24

25

HIGHLY CONFIDENTIAL

1

■

■

■

■

6

7

8

9

10

11

12

13

14

15

16

■

■

■

■

■

■

■

■

■

A. In reviewing this sheet, no, correct.

MR. GOULD: Let's -- we were just on 625.

So let's move on to 626.

The Bates number here is -03962694.

(Exhibit 626 was marked for

identification by the court reporter and is

attached hereto.)

Q. (By Mr. Gould) And did you review this  
spreadsheet in advance of the deposition,

Mr. Fahey?

A. I did.

11:53:47

11:54:04

11:54:16

Page 70

HIGHLY CONFIDENTIAL

1

█

█

█

█

█

█

█

█

█

█

█

█

█

█

█

█

█

█

█

21

MR. SCHWING: Object -- object to form.

22

Just to be helpful, Ben, you just left

█

24

just have --

25

MR. GOULD: Oh, I'm sorry.

11:56:19

Page 71

HIGHLY CONFIDENTIAL

1

2

3

4

5

Q. No.

11:56:40

6

Okay. What does it show?

7

8

9

10

11

12

13

14

15

16

17

18

19

MR. SCHWING: Okay. My -- my apologies

20

for trying to be helpful there. I almost got in

11:57:23

21

the way.

22

MR. GOULD: It is okay. You at least --

23

you at least removed all ambiguity.

24

MR. SCHWING: I'm trying to get -- I'm

25

trying to help us get through this.

11:57:31

Page 72



HIGHLY CONFIDENTIAL

1 MR. GOULD: Yeah. Yeah. Yeah. No, it's 11:57:33

2 great. I appreciate it.

3 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

15 MR. GOULD: Okay. Got it.

11:58:11

16 Moving on to 627, which is

17 Bates number -03962695.

18 (Exhibit 627 was marked for

19 identification by the court reporter and is

20 attached hereto.)

11:58:16

21 THE DEPONENT: Okay. I have it open.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Page 73

HIGHLY CONFIDENTIAL

1

■

■

■

■

■

■

■

■

■

■

■

■

14

■

■

17

18

19

20

■

■

■

■

■

■

■

■

■

■

■

■

■

■

■

■

■

■

■

■

■

■

■

■

■

■

■

■

■

■

Q.

Great.

■

■

■

Does this -- what does that show --

A.

That shows --

Q.

-- the last column?

A.

Yeah, that's a good question.

11:59:24

■

■

■

■

■

■

■

HIGHLY CONFIDENTIAL

1

█

█

█

█

█

█

8

Q. Thank you.

9

A. Yeah.

█

█

█

█

█

█

█

█

█

█

20

Q. Okay. Moving on, we have just reviewed

12:00:49

█

█

23

Sorry. Let me restate that.

█

█

HIGHLY CONFIDENTIAL

1

2

3

4

5

Q. Okay. Are there other ways that Facebook

12:01:49

6

measures video content, that's delivered via the

7

Facebook Platform, that do not appear in the

8

documents we've gone over so far?

9

MR. SCHWING: The question is vague.

10

THE DEPONENT: That's pretty open-ended.

12:02:20

11

Could you be more specific about the kind of metric

12

you're looking for.

13

Q. (By Mr. Gould) Well, sitting here, can

14

you think of any metric that, in your experience,

15

you've seen applied to video content on the

12:02:45

16

Facebook Platform that we haven't spoken about thus

17

far in this deposition?

18

Please take your time.

19

MR. SCHWING: The question is vague.

20

THE DEPONENT: No.

12:03:25

21

Q. (By Mr. Gould) Okay. So does

22

Facebook -- I'll be more specific now.

23

24

25

Page 76

HIGHLY CONFIDENTIAL

1

2

MR. SCHWING: Sorry --

3

THE DEPONENT: If you mean in

4

5

MR. SCHWING: I'm sorry, Mr. Fahey,

12:04:06

6

just -- sorry. You're quicker -- quicker than I

7

am.

8

THE DEPONENT: Sorry.

9

MR. SCHWING: The question is vague.

10

I apologize for interrupting you.

12:04:11

11

You can go ahead, if you understand.

12

Q. (By Mr. Gould) Mr. Fahey, I'll -- just

13

for -- to make things easier, I'm going to restate

14

it.

15

Can Facebook measure the amount of data

12:04:28

16

that's related to video content on the

17

Facebook Platform, relative to the total amount of

18

data on the Facebook Platform?

19

MR. SCHWING: The question is vague.

20

THE DEPONENT: Could I maybe help?

12:04:54

21

Q. (By Mr. Gould) Please. Please.

22

A. Do you mean -- do you mean like -- do you

23

mean in terms --

24

Q. I will take all the help I can get.

HIGHLY CONFIDENTIAL

1 Q. Yeah. 12:05:07

2 A. Is that what you mean?

3 Q. Yeah.

4 A. I would have to -- I would only be

5 speculating. I am not aware -- 12:05:13

6 Q. Okay.

7 A. -- of anything related to that.

8 Q. Does -- can Facebook measure the

9 proportion out of the aggregate user time spent on

10 the platform that users spend watching videos? 12:05:28

11 MR. SCHWING: Vague.

12

13

14

15

16 Q. (By Mr. Gould) Sure. Let's start there.

17 Yes, that's what I mean.

18 A. For that one, no.

19 Let me take a look here. I might be in

20 the wrong sheets. 12:06:40

21 Yeah. I'm -- I'm not -- you know, I'd

22 have to -- I'd be speculating. I'm going through

23 these sheets and I -- and I -- I think understand

24 the question you're asking. And I could only

25 speculate or guess. I'm not aware. 12:06:55

Page 78

HIGHLY CONFIDENTIAL

1 Q. How about -- go to Exhibit 621, if you 12:07:00

2 wouldn't mind --

3 A. Sure.

4 Q. -- which is Bates number, I believe,

5 -03962689? 12:07:09

6 A. Correct.

7 Q. Okay. And do you see column D there?

8 [REDACTED]

9 [REDACTED]

10 [REDACTED] [REDACTED]

11 MR. SCHWING: The question is vague.

12 [REDACTED] [REDACTED]

13 [REDACTED]

14 Q. (By Mr. Gould) Do you know whether

15 Facebook measures the amount of time that users 12:07:45

16 spend on the Facebook Platform?

17 MR. SCHWING: Outside the scope.

18 THE DEPONENT: I do.

19 Q. (By Mr. Gould) And does it keep track of

20 that? 12:08:11

21 MR. SCHWING: Same objection.

22 [REDACTED] [REDACTED]

23 [REDACTED] [REDACTED]

24 [REDACTED]

25 [REDACTED] [REDACTED]

Page 79

HIGHLY CONFIDENTIAL

1 Q. (By Mr. Gould) Fair. 12:08:44

2 It is correct to say, however, that

3 Facebook has the capacity to produce numbers

4 showing the aggregate amount of time that all users

5 spend on the Facebook Platform for a given year; is 12:09:10

6 that correct?

7 MR. SCHWING: Outside the scope.

8 THE DEPONENT: I would only be

9 speculating at this point in time whether or not

10 we -- we do or have produced that number. 12:09:30

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 A. That's correct.

15 Q. And does Facebook store the raw data that 12:09:49

16 is produced by that measurement somewhere?

17 A. I honestly don't know.

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

[REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

[REDACTED]



HIGHLY CONFIDENTIAL

1 Q. Okay. And here we're -- we talked 12:10:59  
2 about -- actually, never mind.

■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED] [REDACTED]  
■ [REDACTED]  
■ [REDACTED]

7 Q. Okay.  
■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]

14 A. I'm sorry. Say that again, please.

15 Q. Sure. 12:11:48  
■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]

23 A. So I'm just trying to correlate your

■ [REDACTED]

25 Q. Take your time. 12:12:43

HIGHLY CONFIDENTIAL

1 A. For that I would be speculating. 12:13:01

2 That would -- that's not something I could -- I  
3 could say yes or no to.

4 Q. For the spreadsheets we have discussed so  
5 far, videos that are included in advertisements on 12:13:18  
6 the Facebook Platform have not been included in any  
7 of the numbers we have looked at, correct?

8 A. That's a great question.

■

■

■

■

■

14 A. Yeah. Sorry for the -- for the term.

15 Q. That's fine. 12:14:10

■

■

■

■

■

■

■

■

■

25 A. I can't -- I can't speak to the -- the 12:15:11

Page 82

HIGHLY CONFIDENTIAL

1

■

■

■

■

12:15:29

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

Q. Let me give an example to see if I

understand what this means.

Suppose that Larry David uploads -- do

you know who Larry David is?

A. (Deponent nods head.)

12:15:56

Q. Okay. Let's suppose that Larry David

uploads a video showing him buying cryptocurrency.

Let's say a cryptocurrency exchange wants to ensure

that people see that video -- or more people see

that video.

12:16:26

Would one way to do that be to boost that

video?

MR. SCHWING: Outside the scope, insofar

as it relates to advertising. There's another

witness for that.

12:16:41

THE DEPONENT: I'd be -- I -- I would be

speculating on how that interplay between the

creator and the company would work. I -- I don't

know the answer to that.

MR. GOULD: Okay.

12:16:57

Page 83

4 MR. GOULD: Sure. Do you want to take a  
5 five- or ten-minute break? I'm happy to do that. 12:17:20

9 MR. GOULD: Oh, I would say -- I -- I  
10 would say that we probably have an hour to go. 12:17:34

13 MR. GOULD: Yeah.

18 THE VIDEOGRAPHER: Okay. We're off the  
19 record. It's 12:17 p.m.

20	(Recess taken.)	12:20:52
----	-----------------	----------

23 Q. (By Mr. Gould) Mr. Fahey, I asked you  
24 whether -- for any of the spreadsheets we have

\_\_\_\_\_

HIGHLY CONFIDENTIAL

1

3

Do you remember that question?

4

A. I do.

8

A. Say that again, please.

22

A. I'm going to give you my best

23

layperson --

24

Q. Please.

25

A. -- understanding. Ads are not my area of

12:38:51

Page 85

HIGHLY CONFIDENTIAL

1

█

█

█

█

█

█

█

█

10

Q. I see.

12:39:28

█

█

█

14

A. That's where you're pushing my

15

understanding of how things work. I -- I don't

12:39:45

█

█

█

█

█

█

█

█

█

█

HIGHLY CONFIDENTIAL

1

2

MR. SCHWING: Objection. Vague.

7

Q. (By Mr. Gould) Sure.

17

A. So if you think about the process by

18

which someone would choose to share a video, they

19

can upload the video without choosing to publish

20

it. Meaning that it's been uploaded and it's

12:42:20

21

stored, but it is not available to anyone other

22

than the person who uploaded it.

HIGHLY CONFIDENTIAL

1 One of those ways is if a user uploads a 12:42:53  
2 video and then shares it with friends, correct?

3 A. If a user that is not -- that is --  
4 that -- when you say "user," do you mean somebody  
5 like yourself or myself, that kind. 12:43:15

6 Q. Yeah.

7 A. If a user uploads a video, it will be  
8 published unless they have specifically set their  
9 privacy settings or their app settings to be  
10 otherwise. 12:43:43

11 Q. What about if a user live streams a  
12 video, is that -- does that fall -- live streams it  
13 such that other Facebook users can watch it.

14 Does that come under the heading of  
15 publishing a video? 12:44:09

■ ■ [REDACTED]

■ [REDACTED]

■ ■ [REDACTED]

■ ■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

23 Q. If an organization or group with a  
24 Facebook page uploads a video to their page, and  
25 the privacy settings are such that other Facebook 12:45:00

Page 88



## HIGHLY CONFIDENTIAL

1 users that -- that -- that Facebook users can watch 12:45:03  
2 it, is that -- does that fall under the heading of  
3 pub- -- publishing the video?

4 A. If a user uploads to a page the way you  
5 described, yes. 12:45:19

6 Q. Okay. And -- well, by -- by user, are  
7 you -- do you -- are you including organizations or  
8 groups of Facebook pages?

9 A. Yes.

10 Q. Okay. If a brand places an ad with 12:45:40  
11 Facebook and that ad includes video content, is  
12 that publishing a video?

13 A. Going back to my caveat that I'm not an  
14 expert on the ad system, if -- when you say  
15 "brand," do you mean an organization or -- or a 12:46:21  
16 user, or somebody -- what do you mean by "brand"?

17 Q. J.C. Penney. Boeing.

18 A. Okay.

19 Q. Sears.

20 A. Sure. 12:46:32

21 Q. Microsoft, whatever.

22 A. If they upload a video to their page,  
23 that's what I mean by published.

24 Q. What if they don't upload it to the page  
25 but simply place it as an ad with Facebook; is that 12:46:50

HIGHLY CONFIDENTIAL

1 publishing a video? 12:46:55

2 A. That starts to get into how the ad system  
3 works. I -- I couldn't speak to that process at  
4 all. Like the -- the way you're summarizing that,  
5 I couldn't speak to that. 12:47:07

6 Q. When a Facebook user uploads video  
7 content to the Facebook Platform, the  
8 Facebook Platform stores that video content  
9 somewhere, correct?

10 A. Yes. 12:47:32

11 Q. Where does it store the video content?

12 A. I don't mean to be difficult here. But  
13 when you say "where" --

14 Q. Uh-huh.

15 [REDACTED] [REDACTED]

16 [REDACTED] [REDACTED]

17 [REDACTED]

18 A. I -- I couldn't speak to physically  
19 where.

20 [REDACTED] [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED] [REDACTED]

24 [REDACTED]

25 [REDACTED] [REDACTED]

HIGHLY CONFIDENTIAL

1

█

█

█

█

█

█

█

9

A. Are you asking how is a video stored?

10

Q. Yes. Sure. Let's start there.

12:49:19

11

How is the video stored?

12

A. I could not really speak to the mechanics

13

of how it's stored.

14

Q. And --

15

MR. SCHWING: Yeah, I'm just going to

12:49:37

16

insert a belated objection that this is outside of

17

the scope. Mr. Fahey can talk about the user's --

18

kind of the infrastructure for the user's access,

19

and, you know, tracking of user's access

20

interactions. But the storing of the actual video

12:49:50

21

is not something that is contemplated under

22

topic 9a or b. And there will be another witness

23

with respect to advertising.

24

Q. (By Mr. Gould) Mr. Fahey, would you mind

25

going back to -- going back to Exhibit 330 for me.

12:50:14

HIGHLY CONFIDENTIAL

1 I'm going to direct your attention to page 15. 12:50:34

2 Let me know when you're there.

3 A. I'm on page 15.

4 Q. Okay. And do you see at the very top of  
5 the page, it reads "b. the records or information 12:51:07  
6 that Facebook has regarding such content and users'  
7 access to, interactions with or sharing of such  
8 content."

9 You understand that that's one of the  
10 subtopics you were designated to testify on; is 12:51:24  
11 that correct?

12 A. Yes, I do.

13 Q. Okay. And do you have any questions  
14 about what that means?

15 A. Yes, I do. 12:51:38

16 Q. Okay. What questions do you have about  
17 what subtopic b means?

18 A. What is meant by records or information.

19 Q. Well, among other things, you know, what  
20 we meant was where and how video content is stored. 12:51:57  
21 But let's -- let's put that aside for now.

22 Are you -- let me just -- again, I don't  
23 want to waste anybody's time.

24 Are you prepared to testify about how and  
25 where video content is stored on Facebook when -- 12:52:19

Page 92

2           A.     I'm prepared to testify about how we  
3     track and measure video.

5	A. And interactions and sharing.	12:52:37
---	----------------------------------	----------

6 Q. Okay. So you're -- you're not prepared  
7 to testify about storage of video content, correct?

8           A.     Correct.  That's not my area of  
9     expertise.

10 Q. Okay. Okay. So you wouldn't be able to 12:52:54  
11 prepare -- you -- you wouldn't be prepared to  
12 testify about whether, say, comments on an uploaded  
13 video are one of the things that are stored along  
14 with the video content itself?

Age Group	Male	Female	Other
18-24	45%	55%	0%
25-34	40%	60%	0%
35-44	35%	65%	0%
45-54	30%	70%	0%
55-64	25%	75%	0%

23 Q. Okay. Are you prepared to testify about  
24 how video content is retrieved or made available to  
25 a user who views it? 12:54:24

HIGHLY CONFIDENTIAL

1 A. No. 12:54:30

2 Q. Okay. Are you prepared to testify about  
3 how video content is retrieved or made available to  
4 a user who comments on it?

5 A. No. 12:54:47

6 Q. Are you prepared to testify about how  
7 video content is delivered to or made available to  
8 a user who shares it?

9 MR. SCHWING: I'll just note that there  
10 is another witness who we've identified who can 12:55:12  
11 discuss how users are able to access video.

12 David Miller will -- will be able to  
13 speak to that. Not necessarily the -- like the  
14 nitty-gritty technical storage issue. But if  
15 you're asking about, you know, video made available 12:55:35  
16 to users, he -- he can address that.

17 So I wanted to just flag that. But if  
18 your questions are more sort of technical in  
19 nature, then...

20 MR. GOULD: Okay. David Miller, who's 12:55:51  
21 designated to testify about subtopic c, will be  
22 able to discuss how users are able to access video?

23 MR. SCHWING: Yeah. In terms of --  
24 right. I mean, there are different tabs in -- on  
25 Facebook you can see through watch or live or -- 12:56:04

Page 94

HIGHLY CONFIDENTIAL

1     you know, and -- and how you could go about doing                   12:56:06  
2     that.

3                 MR. GOULD:   Okay.

4                 MR. SCHWING:   If your questions are  
5     nitty-gritty technical questions --                                 12:56:13

6                 MR. GOULD:   Okay.

7                 MR. SCHWING:   -- about where a video is  
8     stored, like -- you know, and how it works through,  
9     you know, an -- an edge server, or something like  
10    that, I'm not sure why that would be relevant to                   12:56:24  
11    the case, but he wouldn't be able to do that.

12                I don't know why you would want to know  
13    that, but we can -- we can chat with you about  
14    that.   I just wanted to make sure that -- to -- to  
15    try to be helpful in terms of, you know, Mr. Fahey                 12:56:33  
16    today and what he can cover versus other witnesses  
17    that -- that I share that.

18                Q.    (By Mr. Gould)   Again, I don't want to  
19    waste your time, Mr. Fahey.

20                So are you -- are you prepared to testify               12:56:51  
21    about whether video content is stored, just the  
22    fact of storage?

23                A.    As I mentioned before, yeah, I can say  
24    that video is stored.   It -- it gets into --  
25    the how is not my area of expertise.                                 12:57:09

Page 95

HIGHLY CONFIDENTIAL

1 I interpreted topic b as the -- as being 12:57:16  
2 related to topic a. So the systems related to the  
3 counts. The systems related to the numbers and the  
4 metrics that are produced. So that's what I  
5 prepared for today. 12:57:29

6 Q. Got it.

7 Are you aware of any time during which  
8 video content was capable of being uploaded to the  
9 Facebook Platform where uploaded videos were not  
10 stored? 12:57:49

11 A. I couldn't speak to that one way or the  
12 other because that predates my time here.

13 Q. Okay. During your tenure at Facebook,  
14 i.e., since 2014, are you aware of any time during  
15 which videos uploaded to the Facebook Platform were 12:58:09  
16 not stored?

17 A. My definition for upload implies storage.  
18 So if the video was uploaded, it would have been  
19 de facto stored.

20 Q. In other words, storage is inherently a 12:58:37  
21 part of uploading, correct?

22 A. Correct, because if it was not -- if it  
23 was a failed upload, it would not have been stored.

24 Q. Fabulous.

25 If video is live streamed and then saved 12:58:58

Page 96



HIGHLY CONFIDENTIAL

1 to the Facebook Platform, that saving likewise 12:59:01  
2 inherently involves storage, correct?

3 A. That saving process effectively is  
4 another upload -- is another upload process, yes.

5 Q. So every time video content that has been 12:59:20  
6 live streamed is saved to the Facebook Platform, it  
7 is stored?

8 A. Not my area of expertise. And the reason  
9 I'm equivocating here is because you said "every  
10 time," and I would be speculating. 12:59:43

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 Q. Okay.

19 A. It's really -- it's really outside of  
20 what I know. 01:00:15

21 Q. Okay. Are you prepared to -- to testify  
22 about whether or not "comments" and "likes," or  
23 other interactions with video content, whether that  
24 is -- that data is stored?

25 A. Yes, that data is stored. 01:00:50

Page 97

HIGHLY CONFIDENTIAL

1

2

3

which users watch a piece of video content?

4

A. Can you be more specific or provide an

5

example?

01:01:12

6

Q. Sure.

7

Suppose that ten Facebook users watch a

8

video one of their friends has uploaded, are the

9

names and user ID numbers of those watchers stored

10

somewhere on Facebook's systems as having watched

01:01:40

11

the video?

12

MR. SCHWING: The question is vague.

13

14

15

16

17

Q. (By Mr. Gould) I'm -- I'm -- no, I'm

18

talking about watching.

19

20

21

22

23

24

25

Page 98

■■■■■■■■■■

© 2006 The Authors

\_\_\_\_\_

01:03:20

have watched a video stored by Facebook?

01:03:20

\_\_\_\_\_

\_\_\_\_\_

11/11/2016

10/10/2019

\_\_\_\_\_

\_\_\_\_\_

© 2006 The Authors

\_\_\_\_\_

████████████████████

████████████████████

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

10/10/2019

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

██████████

114

\_\_\_\_\_

\_\_\_\_\_

■ \_\_\_\_\_

■ \_\_\_\_\_

\_\_\_\_\_

■ \_\_\_\_\_

\_\_\_\_\_

■ \_\_\_\_\_

\_\_\_\_\_

■ \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

■ \_\_\_\_\_

■ \_\_\_\_\_

■ \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

■ \_\_\_\_\_

■ \_\_\_\_\_

■ \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

■ \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

■ \_\_\_\_\_

\_\_\_\_\_

01:06:33

Veritext Legal Solutions  
866 299-5127

HIGHLY CONFIDENTIAL

1       thereafter. 01:06:35

2               Okay?

3               MR. SCHWING: Okay. Why don't we take --

4       why don't we take a short break and we'll be back.

5               MR. GOULD: Thanks. 01:06:42

6               THE VIDEOGRAPHER: Okay. Off the record.

7       It's 1:06 p.m.

8               (Recess taken.)

9               THE VIDEOGRAPHER: We're back on the

10      record. It's 1:19 p.m. 01:19:49

11      Q.     (By Mr. Gould) We have talked about what

12      Facebook tracks on its platform, correct?

13      A.     Correct.

14      Q.     What I want to know is, you know, do you

15      know whether Facebook tracks access to video 01:20:10

16      content by third parties?

17      A.     I don't.

18              MR. SCHWING: It's outside the scope.

19      Q.     (By Mr. Gould) So tell me if this is a

20      fair understanding of -- of -- of what you have 01:20:30

21      been prepared to testify about today.

22              As I understand it, you prepared to

23      testify today, and are prepared to testify today,

24      about the metrics related to user access to video

25      content, correct? 01:20:55

Page 101

HIGHLY CONFIDENTIAL

1 A. That's topic 9a, correct, that you 01:21:00

2 just --

3 Q. Yeah. I mean -- yes, that's in -- in my  
4 view, it's included in 9a.

5 But what I want to know is I -- I just 01:21:08

6 want to know what -- what -- putting aside,

7 you know -- the -- the notice of deposition, I just

8 want to know the answer to what you are and are not

9 prepared to testify about today. So let me just

10 reask the question. 01:21:22

11 You are prepared to testify today about

12 metrics related to user access to video content,

13 correct?

14 A. Metrics related to user access.

15 I'm prepared to -- to talk about metrics 01:21:40

16 related to video. You'd have to be more specific

17 when you say -- when you get into user access.

18 Q. By "user access," I mean user -- the

19 amount of time users have spent watching videos,

20 the numbers of users who have watched videos, the 01:22:03

21 interactions by viewers to -- to -- by users to --

22 to videos. That's the heading under which I would

23 put "user access."

24 Did -- so -- so that's what I mean by

25 "user access." 01:22:25

Page 102

HIGHLY CONFIDENTIAL

1 Is that -- is that fairly clear? 01:22:26

2 A. That is clear.

3 Q. Okay. So under that definition of user

4 access, you are testi- -- you are prepared to

5 testify about metrics related to user access, 01:22:33

6 correct -- to video content, correct?

7 A. I'm prepared to -- to speak about metrics

8 related to video content.

■

■

■

■

■

14 Q. Sure.

■

■

■

■

■

■

■

■

■

■

■

HIGHLY CONFIDENTIAL

1 A. Correct. 01:24:01

2 Q. So I just -- I -- I just want to  
3 understand. Okay.

4 We've talked about three things you're  
5 prepared to testify about. 01:24:10

6 You're prepared to testify about  
7 aggregated metrics related to user access to video  
8 content.

9 You're prepared to testify about metrics  
10 related to the aggregate amount of video content. 01:24:18

11 And you're prepared to testify about the  
12 systems that are used to produce those metrics,  
13 correct?

14 A. Yes.

15 Q. Is there anything else that you prepared 01:24:31  
16 to testify about today?

17 A. No.

18 MR. GOULD: Okay. I think that does it,  
19 except for --

20 Q. (By Mr. Gould) So during your testimony, 01:24:53  
21 have you consulted with anybody about the substance  
22 of your testimony?

23 A. No.

24 Q. And during this deposition, including  
25 during breaks, has anyone communicated to you about 01:25:06

Page 104



1 the substance of your testimony? 01:25:09

2 MR. SCHWING: Are you talking about other  
3 than attorneys?

4 MR. GOULD: I'm -- I'm including  
5 attorneys, yes. 01:25:19

6 MR. SCHWING: All right. Well, I'll  
7 instruct the witness not divulge any  
8 attorney-client privileged communications that may  
9 or may not have happened.

10 But if you spoke with anybody else, you 01:25:29  
11 can answer that question.

12 Q. (By Mr. Gould) Mr. Fahey, I'm not asking  
13 about the substance of anyone -- anything anyone  
14 may have said to you.

15 What I'm asking about is that -- is 01:25:38  
16 during your deposition today has -- including  
17 during breaks -- has anyone communicated to you  
18 about the substance of your testimony?

19 MR. SCHWING: And the witness is not  
20 going to reveal any communications or the nature of 01:25:50  
21 any communications he had with attorneys. But if  
22 he spoke with a nonattorney, you can ask that.

23 Q. (By Mr. Gould) Do you want me to reask  
24 the question, Mr. Fahey?

25 I'm sorry. 01:26:14

## HIGHLY CONFIDENTIAL

1 SPECIAL MASTER GARRIE: Can I make a 01:26:17  
2 suggestion?  
3 MR. GOULD: Yeah, of course.  
4 SPECIAL MASTER GARRIE: Well, Mr. Fahey,  
5 do you have a question about privilege right now? 01:26:20  
6 THE DEPONENT: I do.  
7 SPECIAL MASTER GARRIE: Okay. So here's  
8 what's going to happen.  
9 We're going to go off the record.  
10 Counsel Schwing, you're going to take five minutes 01:26:28  
11 and explain to Mr. Fahey -- let's go off the  
12 record. Strike what I just said. Let's just go  
13 off the record, please.  
14 THE VIDEOGRAPHER: Okay. We're off the  
15 record. It's 1:26 p.m. 01:26:41  
16 (Recess taken.)  
17 THE VIDEOGRAPHER: We're back on the  
18 record. It's 1:33 p.m.  
19 MR. GOULD: I'll just reask the question  
20 again just to make sure we all understand each 01:33:17  
21 other.  
22 Q. (By Mr. Gould) During this deposition,  
23 including during breaks, has anyone communicated to  
24 you about the content and substance of your  
25 testimony? 01:33:31

Page 107

HIGHLY CONFIDENTIAL

1 Mr. Fahey -- 01:34:40

2 THE DEPONENT: I can hang up.

3 MR. SCHWING: Yeah. Thank you,

4 Mr. Fahey.

5 SPECIAL MASTER GARRIE: We'll go off the 01:34:45  
6 record.

7 THE VIDEOGRAPHER: Okay. We're off the  
8 record. It's 1:34 p.m.

9 (TIME NOTED: 1:34 p.m.)

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

Page 108

HIGHLY CONFIDENTIAL

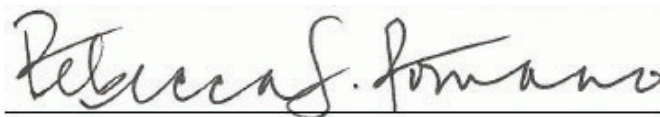
1 I, Rebecca L. Romano, a Registered  
2 Professional Reporter, Certified Shorthand  
3 Reporter, Certified Court Reporter, do hereby  
4 certify:

5 That the foregoing proceedings were taken  
6 before me remotely at the time and place herein set  
7 forth; that any deponents in the foregoing  
8 proceedings, prior to testifying, were administered  
9 an oath; that a record of the proceedings was made  
10 by me using machine shorthand which was thereafter  
11 transcribed under my direction; that the foregoing  
12 transcript is true record of the testimony given.

13 Further, that if the foregoing pertains to the  
14 original transcript of a deposition in a Federal  
15 Case, before completion of the proceedings, review  
16 of the transcript [X] was [ ] was not requested.

17 I further certify I am neither financially  
18 interested in the action nor a relative or employee  
19 of any attorney or any party to this action.

20 IN WITNESS WHEREOF, I have this date  
21 subscribed my name this 26th day of July, 2022.

22  
23 

24 Rebecca L. Romano, RPR, CCR

25 CSR. No 12546

Page 109

## HIGHLY CONFIDENTIAL

1 RE: FACEBOOK, INC., CONSUMER USER PROFILE LITIGATION  
2 MICHAEL FAHEY (JOB NO. 5300517)

## E R R A T A S H E E T

3  
4 PAGE 16 LINE 2 CHANGE "Shweta Metkar" to  
5 "Shweta Medhekar"

6 REASON Typo

7 PAGE 16 LINE 2 CHANGE "Gee" to "Ji"

8  
9 REASON Typo

10 PAGE 24 LINE 7 CHANGE [REDACTED]

11  
12 REASON Misspoke

13 PAGE 29 LINE 21 CHANGE [REDACTED]

14  
15 REASON Mistranscription

16 PAGE 30 LINE 9 CHANGE [REDACTED]

17  
18 REASON Misspoke

19 PAGE 70 LINE 22-24 CHANGE [REDACTED]

20  
21 REASON Mistranscription (deponent's [REDACTED] is audible in  
22 the deposition video)

23 \_\_\_\_\_ Michael Fahey \_\_\_\_\_ 09-Sep-22 | 21:00 PDT

24 MICHAEL FAHEY

Date

## HIGHLY CONFIDENTIAL

RE: FACEBOOK, INC., CONSUMER USER PROFILE LITIGATION  
MICHAEL FAHEY (JOB NO. 5300517)

## E R R A T A S H E E T

PAGE 70 LINE 22-24 CHANGE

REASON Mistranscription

PAGE 86 LINE 8 CHANGE

REASON Mistranscription

PAGE LINE CHANGE

REASON

PAGE LINE CHANGE

REASON

PAGE LINE CHANGE

REASON

PAGE LINE CHANGE

REASON

*Michael Fahey*

09-Sep-22 | 21:00 PDT

MICHAEL FAHEY

Date

HIGHLY CONFIDENTIAL

[&amp; - 75201]

<b>&amp;</b>	<b>12:36</b> 84:22	<b>2100</b> 5:20	<b>56</b> 7:20
<b>&amp;</b> 1:14 2:19 4:15 5:5 6:5 9:23 110:23 111:9	<b>13</b> 8:19 65:24 66:3	<b>212</b> 5:12	<b>5th</b> 6:16
<b>0</b>	<b>14</b> 13:5	<b>213</b> 6:10,19	<b>6</b>
<b>013</b> 65:25	<b>15</b> 92:1,3	<b>214</b> 5:22	<b>6</b> 1:12
<b>02843</b> 1:4 2:4	<b>18</b> 1:4 2:4	<b>21st</b> 9:8	<b>61</b> 7:23
<b>03959476</b> 7:12	<b>19</b> 7:11	<b>229-7523</b> 6:10	<b>619</b> 7:11 19:2,7 23:19,21,22 25:8 39:21 41:11
<b>03959477</b> 7:15	<b>1:06</b> 101:7	<b>24</b> 34:3	<b>620</b> 7:14 25:17 25:18 26:1 39:8 39:19 41:11
<b>03962689</b> 7:18 79:5	<b>1:19</b> 101:10	<b>253-9706</b> 6:19	<b>621</b> 7:17 45:3,20 45:24 46:1 79:1 80:21
<b>03962690</b> 7:21	<b>1:26</b> 106:15	<b>26</b> 110:3	<b>622</b> 7:20 56:1,2 56:11 58:11 61:7 78:14
<b>03962691</b> 7:24 61:14	<b>1:33</b> 106:18	<b>2689</b> 40:6	<b>623</b> 7:23 58:12 61:9,12,13
<b>03962693</b> 8:8 67:12	<b>1:34</b> 108:8,9	<b>2690</b> 78:13	<b>623-1900</b> 3:14
<b>03962694</b> 8:11 70:9	<b>2</b>	<b>26th</b> 109:21	<b>624</b> 8:4 63:15,18 67:7 69:16 70:3
<b>03962695</b> 8:14 73:17	<b>20-0466</b> 1:22	<b>2843</b> 1:3 2:3	<b>625</b> 8:7 67:8,11 70:7
<b>03970356</b> 8:5 63:20	<b>200</b> 5:10 17:20	<b>3</b>	<b>626</b> 8:10 70:8,10
<b>1</b>	<b>2001</b> 5:19	<b>30</b> 1:12 111:1	<b>627</b> 8:13 73:16 73:18
<b>1</b> 1:17,25 7:3 14:7 111:1	<b>2007</b> 14:7	<b>3000</b> 4:20	<b>63</b> 8:4
<b>1,000</b> 66:4	<b>2014</b> 17:18,23 18:1 51:24 52:3 52:10 55:13,14 67:1 96:14	<b>301</b> 4:9	<b>67</b> 8:7
<b>10166-0193</b> 5:11	<b>2016</b> 58:17 69:2	<b>3200</b> 3:12	<b>698-3206</b> 5:22
<b>10:19</b> 2:18 9:3,7	<b>2017</b> 17:21	<b>32nd</b> 6:17	<b>7</b>
<b>113</b> 1:25	<b>2018</b> 17:20,21	<b>330</b> 8:19 13:2 18:20 91:25	<b>70</b> 8:10
<b>11:06</b> 41:5	<b>2019</b> 51:24 52:3 52:17 55:13,14 58:2 65:23 66:4 67:4 69:3	<b>333</b> 6:8	<b>73</b> 8:13
<b>11:13</b> 41:8	<b>2022</b> 1:16 2:18 9:2,8 109:21 110:3,5 112:7	<b>3491</b> 1:23	<b>7321</b> 109:23
<b>12</b> 7:5	<b>2025.520</b> 110:9 110:12	<b>351-6381</b> 5:12	<b>75201</b> 5:21
<b>1201</b> 3:11	<b>206</b> 3:14	<b>393-8200</b> 4:22	
<b>12546</b> 1:21 109:25	<b>21</b> 1:16 2:18 9:2 110:5	<b>3s</b> 74:16	
<b>12:17</b> 84:19		<b>4</b>	
		<b>415</b> 4:22	
		<b>45</b> 7:17 107:13	
		<b>456-1496</b> 4:11	
		<b>5</b>	
		<b>50</b> 72:12	
		<b>5300517</b> 1:24 110:5 113:2	
		<b>555</b> 4:19 6:16	



HIGHLY CONFIDENTIAL

**[801 - application]**

<b>8</b>	103:5,16 104:7	<b>adverbs</b> 55:21	104:10
<b>801</b> 4:8	<b>accessed</b> 13:10	<b>advertise</b> 42:3	<b>analysis</b> 54:25
<b>805</b> 4:11	<b>accurate</b> 28:6	<b>advertisement</b>	<b>analytics</b> 16:24
<b>827</b> 1:22	33:11,14,17	86:4,5,6,7,8 87:9	29:6,6
<b>9</b>	<b>accurately</b> 32:21	<b>advertisements</b>	<b>analyzed</b> 31:4
	32:25 33:4,8	82:5 85:1	37:12
<b>90013</b> 6:18	<b>action</b> 109:18,19	<b>advertiser</b> 42:2	<b>angeles</b> 6:9,18
<b>90071-3197</b> 6:9	<b>actions</b> 1:7 2:7	<b>advertisers</b>	<b>answer</b> 28:14
<b>93101</b> 4:10	<b>activity</b> 49:5	44:17	39:2 63:6,7
<b>94105-0921</b> 4:21	<b>actual</b> 26:18	<b>advertising</b>	64:24 65:17
<b>9476</b> 18:7 25:8	27:21 29:16	45:13,14 83:19	83:24 86:16
<b>9477</b> 18:25 39:7	91:20	91:23	98:24 99:3
<b>98101</b> 3:13	<b>ad</b> 82:19,20 83:4	<b>affect</b> 35:7	102:8 105:11
<b>9a</b> 13:8 91:22	85:7,11,13,13,15	<b>aggregate</b> 24:8	<b>answered</b> 50:18
102:1,4	85:21 86:13,17	48:7 57:13,13	<b>answering</b> 34:6
<b>a</b>	86:20 87:1,13	65:6 72:2 74:23	<b>anybody</b> 104:21
<b>a.m.</b> 2:18 9:3,7	89:10,11,14,25	78:9 80:4 81:6	105:10
41:5,8	90:2	81:17 99:4,7,10	<b>anybody's</b> 52:25
<b>ability</b> 63:8	<b>adaniel</b> 3:18	100:22 103:20	92:23
<b>able</b> 21:11 22:11	<b>add</b> 34:18,24	104:10	<b>anyone's</b> 19:18
27:21 31:7	<b>address</b> 27:18	<b>aggregated</b>	<b>apologies</b> 72:19
35:10,20 39:11	28:2 30:12	37:13 56:22	<b>apologize</b> 55:20
39:12,14 40:1	94:16	71:8 72:7	77:10
48:14 50:9,25	<b>adele</b> 3:9	103:10,16 104:7	<b>app</b> 24:10,12,24
52:19 53:10	<b>adjectives</b> 55:21	<b>aggregation</b>	25:1 43:17,19
55:8 58:3 59:15	<b>administered</b>	99:11,12	48:22,25 82:11
63:3 93:10,19	12:2 109:8	<b>agree</b> 10:15	85:12 88:9
94:11,12,22,22	<b>administering</b>	<b>ahead</b> 21:23,24	<b>appear</b> 18:17
95:11 100:25	10:16	77:11 84:16	76:7 112:4
<b>absolutely</b> 36:14	<b>admissible</b> 64:25	<b>algorithm</b> 27:22	<b>appearances</b> 3:1
40:20	<b>ads</b> 44:17 85:16	28:6	4:1 5:1 6:1
<b>acceptable</b>	85:17,25 87:5,13	<b>amanda</b> 16:1	<b>appearing</b> 3:2
107:15	<b>advance</b> 16:4,8	<b>ambiguity</b> 72:23	4:2 5:2 6:2
<b>access</b> 91:18,19	19:14 20:4	<b>amount</b> 13:13,13	110:18 111:7
92:7 94:11,22	32:16 34:10	48:7 76:24,25	<b>appears</b> 23:24
101:15,24	56:13 61:16	77:15,17 79:15	26:23 64:7 87:8
102:12,14,17,18	63:22 69:25	80:4 99:22	<b>application</b>
102:23,25 103:4	70:14 73:12	102:19 103:20	16:19,22 33:3

**[application - broadly]**

42:18,19,25 43:1 <b>applications</b> 42:22 <b>applied</b> 76:15 <b>applies</b> 63:24 <b>appreciate</b> 41:2 73:2 107:3 <b>approach</b> 29:8 <b>approximate</b> 17:16 <b>approximately</b> 17:18 <b>approximation</b> 84:14 <b>apps</b> 48:12,16 <b>area</b> 20:25 28:10 28:12 29:21 85:25 93:8 95:25 97:8,15 <b>artist</b> 14:11 <b>aschwing</b> 4:23 110:2 <b>aside</b> 75:24 92:21 102:6 <b>asked</b> 34:1,3 50:15 53:21 58:14 79:23 84:23 <b>asking</b> 12:15,17 20:14 23:6 31:16 37:6 49:4 50:6 54:2 60:11 78:12,14,24 80:21 91:9 94:15 105:12,15 <b>aspect</b> 43:22 <b>associate</b> 6:23	<b>associated</b> 91:8 <b>assume</b> 24:17 26:8 71:3 <b>assuming</b> 62:15 <b>attached</b> 15:7 19:4 25:20 45:22 56:4 61:11 63:17 67:10 70:12 73:20 <b>attention</b> 21:14 25:11 92:1 <b>attorney</b> 4:7 5:18 6:7 9:16 10:19 105:8 109:19 <b>attorneys</b> 3:10 4:18 5:9 105:3,5 105:21 <b>austin</b> 4:16 9:22 110:1 <b>available</b> 13:10 35:2 48:11 51:6 51:13 52:2,10,17 57:4,14 58:2 66:18,21,25 67:3 69:2 87:21 93:24 94:3,7,15 <b>avenue</b> 3:11 5:10 5:19 6:8 <b>average</b> 30:9 <b>avoid</b> 36:6,14 38:4,8,13 55:5 61:4 73:8 75:15 <b>aware</b> 16:3,6 78:5,25 96:7,14	<b>b</b> <b>b</b> 1:12 6:14 7:8 8:1 27:3 78:13 91:22 92:5,17 96:1 111:1 <b>back</b> 23:15 24:16 29:23 30:22 39:18,21 41:7,9 52:23 56:9 59:10 69:16 84:17,21 89:13 90:24,25 91:25,25 101:4,9 106:17 <b>backyard</b> 40:19 <b>barbara</b> 4:10 <b>based</b> 28:1 33:15 36:20 39:10 47:16 87:3 <b>basketball</b> 46:21 51:13 <b>bates</b> 18:6,25 61:14 63:19 67:12 70:9 73:17 78:13 79:4 <b>bear</b> 56:7 <b>bearing</b> 87:13,16 <b>beginning</b> 9:15 <b>behalf</b> 2:16 10:13 13:16,24 44:17 <b>belated</b> 91:16 <b>believe</b> 13:22 22:24 39:18 61:8 63:18 79:4 <b>ben</b> 38:25 40:11 40:14 65:14	71:22 84:1 <b>bendat</b> 6:23 10:1 <b>benjamin</b> 3:6 9:18 12:8 40:14 <b>best</b> 34:12 35:1 35:14 63:7,8 85:22 <b>better</b> 34:6 43:23 86:17 <b>beyond</b> 44:13 <b>bgould</b> 3:15 <b>binding</b> 10:17 <b>bit</b> 20:1 30:5 42:18 58:20 60:16 <b>boeing</b> 89:17 <b>boost</b> 82:18 83:4 83:16 <b>boosted</b> 82:10,13 82:23 85:7,11 <b>bottom</b> 13:5 <b>brand</b> 89:10,15 89:16 <b>break</b> 40:18,22 63:3,12 84:3,5 84:16 100:24 101:4 <b>breakdown</b> 63:12 <b>breakout</b> 41:3 <b>breaks</b> 104:25 105:17 106:23 <b>briefly</b> 41:9 <b>broad</b> 22:8 54:19 <b>broadly</b> 57:22 69:6
---	---	---	--

[browser - comes]

<b>browser</b> 18:16 <b>bug</b> 59:2,4,8,16 60:4 61:1 <b>builds</b> 37:14 <b>bunch</b> 40:5,17 42:7 65:25 <b>business</b> 15:15 32:12,18 54:5 <b>button</b> 18:16 60:2 68:13 <b>buying</b> 83:12	<b>captured</b> 46:13 49:2,6,14,19 50:17 51:19 <b>captures</b> 47:24 47:25 48:7 51:24 64:18 71:12 <b>capturing</b> 10:9 <b>careful</b> 35:24 36:1,4,5,10,12 <b>carefully</b> 39:13 39:23 <b>cari</b> 3:8 <b>case</b> 1:4 2:4 12:16 32:19 51:16 95:11 99:14 109:15 <b>cases</b> 53:20 <b>cassarah</b> 5:6 9:24 <b>casual</b> 30:21 <b>categories</b> 66:13 <b>category</b> 100:9 <b>caused</b> 20:10 <b>caveat</b> 89:13 <b>caveated</b> 34:19 34:20 <b>caveats</b> 34:18,24 87:5 <b>cayman</b> 15:25 <b>ccp</b> 110:9,12 <b>ccr</b> 1:21,22,23 109:24 <b>certain</b> 31:3 <b>certainly</b> 60:20 <b>certified</b> 2:20,21 109:2,3	<b>certify</b> 109:4,17 <b>change</b> 33:14 113:4,7,10,13,16 113:19 <b>changed</b> 13:14 20:6 21:5 <b>changes</b> 19:20 19:23 20:7,21 21:12 107:14 <b>changing</b> 33:20 <b>characteristics</b> 27:24 <b>characterize</b> 31:18,22 35:24 36:11,13 38:21 <b>characterized</b> 36:6 <b>chart</b> 58:5 68:8 <b>charts</b> 14:20 81:24 <b>chat</b> 45:16 95:13 <b>child's</b> 46:20 <b>choose</b> 46:24 68:18,18,19 82:16,17 87:18 <b>choosing</b> 87:19 <b>chris</b> 4:6 9:20 18:6 40:4,9 <b>chu</b> 5:6 9:24 <b>circumstances</b> 31:5 <b>civil</b> 110:19,20 <b>clarified</b> 15:6 <b>clarify</b> 20:11 26:4 <b>clarity</b> 22:20 <b>class</b> 9:18	<b>classification</b> 82:21,22 <b>claufenberg</b> 3:17 <b>clean</b> 12:13 <b>clear</b> 45:12 103:1,2 <b>click</b> 18:15 <b>client</b> 105:8 <b>cmchu</b> 5:13 <b>code</b> 110:9,12,19 110:20 <b>collected</b> 59:5 <b>collection</b> 37:19 37:20 38:3 54:22 <b>colloquialism</b> 30:5 <b>colorado</b> 1:15 2:17 9:1 <b>column</b> 24:1,5 24:22 27:1,3 41:13 46:3,12 47:8,8,20 49:19 50:18 57:11 61:18 62:4 64:9 64:16,17 67:20 71:7 74:4,12,15 74:19 78:13 79:7 <b>columns</b> 23:22 26:24 45:8 46:2 56:16 64:6 67:13 70:22 73:22 <b>com</b> 52:7 <b>come</b> 88:14 <b>comes</b> 60:2
<b>c</b>			
<b>c</b> 21:11 22:16 47:8 53:10 94:21 107:22 <b>ca</b> 7:12,15,18,21 7:24 8:5,8,11,14 110:9,12,20 <b>calculation</b> 55:2 55:4 <b>california</b> 1:2,21 2:2 4:10,21 6:9 6:18 <b>call</b> 13:3 30:12 41:24 <b>called</b> 15:8,10 29:15 54:14 91:5 <b>campen</b> 3:8 <div style="background-color: black; width: 100px; height: 1em;"></div> <b>capable</b> 96:8 <b>capacity</b> 14:1 80:3 <b>capture</b> 47:23 48:4 56:21 57:12 67:21 71:7			

HIGHLY CONFIDENTIAL

**[comfortable - counts]**

<b>comfortable</b> 20:24 28:5,11 30:23 <b>commencing</b> 2:17 <b>comment</b> 62:7 <b>commented</b> 98:14,15 <b>comments</b> 62:16 62:23 63:4 75:25 93:12,15 94:4 97:22 <b>common</b> 30:16 <b>communicated</b> 104:25 105:17 106:23 <b>communications</b> 105:8,20,21 <b>company</b> 15:7 15:11,14 83:23 <b>completed</b> 110:7 110:17 111:6 <b>completion</b> 109:15 111:10 <b>complex</b> 60:16 <b>complexities</b> 60:3 <b>complies</b> 10:24 <b>compound</b> 38:25 52:4,8 <b>con</b> 51:5 <b>concept</b> 43:20 <b>concern</b> 45:18 <b>conclusion</b> 68:17 <b>confidential</b> 1:10 107:10 <b>conflict</b> 27:20	<b>confused</b> 15:9 17:21 <b>confusion</b> 15:17 23:12 <b>consider</b> 43:18 <b>considered</b> 87:9 <b>consulted</b> 104:21 <b>consulting</b> 18:3 <b>consults</b> 32:13 <b>consumer</b> 1:4 2:4 9:10 110:4 113:1 <b>cont'd</b> 5:1 6:1 8:1 <b>contact</b> 110:9 <b>contained</b> 112:4 <b>containing</b> 75:21 <b>contemplated</b> 91:21 <b>content</b> 13:8,9 13:13,14 51:4,5 53:13 54:10,12 63:1,2 64:20 65:11 66:4,6,18 68:15,16 75:22 76:3,6,15,24 77:16 84:25 86:3,23 89:11 90:7,8,11 91:7 92:6,8,20,25 93:1,7,14,20,24 94:3,7 95:21 96:8 97:5,23 98:3 101:16,25 102:12 103:6,8 103:17,20 104:8 104:10 106:24	<b>context</b> 36:5 <b>contractor</b> 40:19 <b>converting</b> 29:10 <b>corporate</b> 1:13 <b>correct</b> 17:24 22:2 23:24 24:2 24:3,9,11,19 26:24,25 27:1,2 27:3 28:4 36:18 39:7,16,24 41:14 41:15,17,18 42:13 44:1,6 46:3,4,6,7 47:6,9 47:10,12,13,21 47:22 48:5,6,10 49:20,24 50:18 50:24 51:19,20 51:25 52:1,18 53:4,6 54:20,21 54:23,24 55:1 56:6,14,16,17 57:7,10,16,17,18 57:19,19,23 59:6 59:7 61:19,20,22 61:24,25 62:2,3 62:5,8,9,13,18 62:19 64:3,4,7 64:14,15 66:19 66:20,22,23 67:1 67:2,5,15,16,18 67:19 68:24 69:3,4,7,8,11,22 69:23 70:6,19,20 71:1,2,5,19 72:16 73:5,6,9 73:10,23,24,25 74:5,6,8,9,12,13 75:2,4,22 76:3,4	79:6 80:2,6,13 80:14 81:5,13,18 81:19 82:7 85:7 86:13 88:2 90:9 91:8 92:11 93:7 93:8,21,22 96:21 96:22 97:2 99:17,20,23,24 100:2,3,15,19 101:12,13,25 102:1,13 103:6,6 103:17,21,22,25 104:1,13 112:5 <b>corrected</b> 112:5 <b>correction</b> 14:3 <b>corrections</b> 110:14,15 111:3 111:4 112:3 <b>correlate</b> 81:23 <b>corresponds</b> 63:19 <b>counsel</b> 3:1 4:1 5:1 6:1,23 9:15 10:15 16:4 106:10 107:4,18 110:18,21 111:7 <b>count</b> 59:6 67:23 85:15 <b>counted</b> 46:23 57:5 66:6 68:10 85:18 86:8,11 <b>counting</b> 33:21 65:5 <b>country</b> 47:9 48:2 74:2,23 <b>counts</b> 31:23 33:2,5,8 82:9 85:6,10 87:3
---	--	--	---

HIGHLY CONFIDENTIAL

**[counts - determined]**

<p>96:3  <b>couple</b> 19:17  45:15  <b>course</b> 18:9  19:25 56:8  86:19 106:3  <b>court</b> 1:1 2:1,21  10:5,13,14,22,25  19:3 25:19  45:21 56:3  61:10 63:16  67:9 70:11  73:19 109:3  <b>cover</b> 14:6 22:23  44:23 95:16  <b>covering</b> 44:24  <b>create</b> 57:21  86:4  <b>created</b> 26:7,11  26:12,13 28:21  29:3 64:2 74:7  75:11 86:23  <b>creating</b> 73:7  75:14  <b>creation</b> 26:10  <b>creative</b> 86:2  <b>creator</b> 43:12,15  43:16 44:6,7,8,9  54:13 68:15,16  83:23  <b>creators</b> 53:13  54:10,12  <b>criteria</b> 27:12,25  30:3 74:7  <b>crutcher</b> 4:15  5:5 6:5 9:23  <b>cryptocurrency</b>  83:12,13</p>	<p><b>cspringer</b> 4:12  <b>csr</b> 1:21,21,22  109:25  <b>current</b> 14:22,23  15:22 16:16</p> <hr/> <p><b>d</b></p> <hr/> <p><b>d</b> 7:1 62:16 79:7  107:22  <b>dallas</b> 5:21  <b>daniel</b> 3:9 6:14  <b>data</b> 16:18,20,21  17:11,23 21:18  24:21,25 26:17  26:19 27:19  29:17,21 36:19  36:19 37:1,11,15  37:17,20,24 38:3  38:7 41:13 52:2  52:9,12,13,17  54:23 55:1  56:21 57:25  59:4 63:9 66:25  69:2,6 73:4  76:24 77:1,15,18  80:15 97:24,25  <b>date</b> 109:20  110:16 111:5  113:24  <b>dates</b> 17:16  <b>david</b> 83:8,9,11  94:12,20  <b>day</b> 32:12,12,18  32:18 57:4  80:20,23 81:3,6  81:12,17,21  109:21 112:6</p>	<p><b>days</b> 45:16  107:13  <b>de</b> 96:19  <b>decisions</b> 31:11  <b>declare</b> 112:1  <b>defendant</b> 9:23  <b>definition</b> 36:4  36:10 96:17  103:3  <b>definitive</b> 33:18  <b>delivered</b> 76:6  94:7  <b>delivers</b> 44:16  <b>demand</b> 47:5  57:3,7,16 58:8  68:15  <b>denominator</b>  66:17  <b>department</b> 29:4  <b>depends</b> 54:2  59:25  <b>deponent</b> 2:16  7:2 10:17,24  11:5 18:12,18  19:22 20:24  21:20 22:6 28:9  30:19 31:13,21  32:5,23 34:17  35:18 36:9 37:5  38:16 44:19  48:14 49:4 52:5  53:6 55:19  73:21 76:10,20  77:3,8,20 78:12  79:12,18,22 80:8  83:10,21 87:3  98:13 106:6  108:2</p>	<p><b>deponent's</b> 1:15  <b>deponents</b> 109:7  <b>deposition</b> 1:12  2:15 9:9 10:16  11:2 12:9 14:17  15:4 16:5,9  19:14 20:4 26:2  32:17 34:11  41:11 56:14  61:16 63:22  69:25 70:14  73:12 76:17  102:7 104:24  105:16 106:22  109:14 110:19  110:22,24 111:8  111:10  <b>depositions</b>  107:12  <b>derek</b> 3:7  <b>describe</b> 28:23  30:2 46:10  55:23  <b>described</b> 27:4  35:21 89:5  <b>description</b> 7:10  8:3 30:17 31:2  <b>designate</b> 107:8  107:9  <b>designated</b> 21:10  22:15 92:10  94:21  <b>designee</b> 44:15  45:1,11 53:9  <b>designees</b> 45:14  <b>determine</b> 27:13  <b>determined</b>  110:18,22 111:7</p>
---	---	--	---



## [device - exhibits]

<b>device</b> 42:21	19:6,13 26:1	<b>effort</b> 36:6,14	<b>everybody</b> 47:14
<b>devices</b> 10:10	55:8 61:16	38:4,7 55:5 61:4	<b>evolved</b> 83:3
<b>devotes</b> 21:17	63:22	69:9,12,21 73:8	<b>exactly</b> 19:23
22:4	<b>documents</b> 16:3	75:15	54:2
<b>dgarrie</b> 6:20	16:8 18:14,17	<b>either</b> 17:21 99:3	<b>examination</b> 7:2
<b>different</b> 53:19	26:7,10 28:18,20	<b>emoji</b> 100:13	12:5
82:21,22 94:24	38:17 76:8	<b>employee</b> 109:18	<b>examined</b> 12:2
<b>differently</b> 50:1	<b>doing</b> 41:24 95:1	<b>employees</b> 14:22	<b>example</b> 30:6
85:19	107:11	14:23 15:23	46:19 47:25
<b>difficult</b> 60:14	<b>dominant</b> 66:13	26:6,8	51:11 66:14
63:5 90:12	<b>drive</b> 20:9,16	<b>enable</b> 54:10,12	83:6 98:5
<b>direct</b> 21:13	<b>drove</b> 19:20,22	<b>enables</b> 53:13	100:12,13
24:10,14 92:1	20:21 21:11	<b>encompass</b>	<b>excel</b> 7:11,14,17
<b>directed</b> 25:10	<b>dunn</b> 4:15 5:5	27:10	7:20,23 8:4,7,10
45:13	6:5 9:23 16:4	<b>ended</b> 76:10	8:13
<b>direction</b> 109:11	<b>duration</b> 30:7	<b>engineering</b>	<b>excellent</b> 27:15
<b>directly</b> 24:7	48:4 56:20,22	16:18,20,21	<b>exchange</b> 83:13
26:9 43:14	58:1,19 59:14	17:12,23	<b>excuse</b> 15:22
<b>discern</b> 39:12,15	71:1,3,7 72:2,2,8	<b>english</b> 29:3,5	28:18 50:3
40:1 55:8 69:14	<b>durations</b> 59:9	<b>ensure</b> 38:18	56:25 97:12
69:25 73:12	59:12	69:9,21 83:13	<b>executed</b> 112:6
75:17	<b>duty</b> 41:24	<b>entire</b> 47:3	<b>exhaustive</b> 66:8
<b>disclosed</b> 27:18	<b>e</b>	<b>equivocating</b>	<b>exhibit</b> 7:11,14
28:2	<b>e</b> 5:7 7:1,8 8:1	97:9	7:17,20,23 8:4,7
<b>disclosing</b> 32:3	110:9,12 111:1	<b>errata</b> 110:14,16	8:10,13,19 13:2
<b>discuss</b> 60:7,14	113:3,3,3	111:3,5	13:4 18:20 19:2
94:11,22	<b>earlier</b> 22:22	<b>errors</b> 36:6,14	19:7 23:18,21,22
<b>discussed</b> 62:2	41:10 47:17	37:2 38:4,8,13	24:22 25:17,18
75:25 79:10	54:19 57:23	38:18,21 39:4,11	26:1,4,5,23 27:5
82:4 84:25	62:2 69:7 74:8	39:15 40:1 55:5	39:19 45:3,20
<b>discussion</b> 59:11	74:12	55:8 58:15	46:1 56:2 61:9
<b>distinction</b> 68:2	<b>easier</b> 77:13	60:24 61:5	61:13 63:14,15
<b>district</b> 1:1,2 2:1	<b>easiest</b> 66:2,7,9	69:11,14,21 70:1	67:8 70:10
2:2	<b>easily</b> 60:9	73:8,13 75:15,18	73:18 78:14
<b>divulge</b> 105:7	<b>edge</b> 95:9	<b>essence</b> 100:16	79:1 80:21
<b>dloeser</b> 3:16	<b>effectively</b> 82:18	<b>essentially</b> 37:17	91:25
<b>document</b> 1:6	82:20 97:3	<b>establish</b> 12:21	<b>exhibits</b> 8:17
2:6 18:11,24			41:11

HIGHLY CONFIDENTIAL

**[existence - five]**

<b>existence</b> 86:12 86:25 <b>existing</b> 81:24 <b>expect</b> 21:9 22:15 29:14 <b>expecting</b> 53:9 <b>experience</b> 76:14 <b>expert</b> 89:14 <b>expertise</b> 21:1 28:10 29:21 86:1 93:9 95:25 97:8,16 <b>explain</b> 68:2 82:12 106:11 <b>explained</b> 30:23 <b>explanation</b> 65:15 <b>explore</b> 54:7 <b>external</b> 29:5 <b>externally</b> 30:1 31:9	26:19 27:7,8,12 28:7,13 31:10 32:3,18,20 34:14 34:14 35:12,13 35:15,15 36:11 36:25 38:13 41:17,19,20,21 41:22,24 42:4,10 42:12,18 43:1,4 43:6,9,17,19,22 44:4,5,11,16 48:20,22,22,23 48:24 49:1,13,17 49:21,22,23 50:2 50:5,16,19,20,22 50:22,23,24 51:1 51:6,13,17 52:20 53:3,13 54:9,17 57:9,18 59:21 61:3 63:3 64:3 64:20 65:21 66:19,22 68:4,14 69:5,9,20 70:19 71:13,19 72:3,15 73:8 75:4,7,11 75:14 76:5,7,16 76:22,23 77:1,15 77:17,18 78:8 79:15,16 80:3,5 80:12,13,15,18 80:19,20 81:4,13 81:16 82:6,24 87:1 88:13,24,25 89:1,8,11,25 90:6,7,8,16,24 91:1,6 92:6,25 93:1 94:25 96:9 96:13,15 97:1,6	97:13 98:2,7,13 98:19,22,23 99:1 99:2,5,9,15 100:19 101:12 101:15 110:4 113:1 <b>facebook's</b> 1:12 24:10 32:12 38:2 55:4 90:21 90:21 97:14 98:10 <b>fact</b> 53:18 95:22 <b>facto</b> 96:19 <b>factors</b> 27:16 35:7 <b>facts</b> 12:21 <b>fahey</b> 1:13 2:15 7:3 9:9 10:22 12:1,7 13:4 18:10 19:10 21:14 22:24 23:6,21 39:6 45:3 46:2 52:24 58:24 59:24 60:5,17,23 61:13 61:15 63:21 70:15 75:22 77:5,12 84:23 91:17,24 95:15 95:19 105:12,24 106:4,11 107:21 108:1,4 110:5 112:1,13 113:2 113:24 <b>failed</b> 96:23 <b>fair</b> 20:2 23:16 30:14,16 31:2 34:11 37:25	38:1 39:13 44:14 55:11 80:1 86:21 101:20 <b>fairly</b> 103:1 <b>fall</b> 88:12 89:2 <b>familiar</b> 28:17 28:19 <b>family</b> 49:1 <b>fan</b> 16:1 <b>far</b> 76:2,8,17 82:5 99:8 <b>fast</b> 84:7 <b>fb</b> 7:12,15,18,21 7:24 8:5,8,11,14 <b>feasible</b> 63:11 <b>federal</b> 109:14 111:1,8,9 <b>feel</b> 12:24 20:24 28:5 <b>felisha</b> 6:6 10:2 <b>file</b> 25:13 27:8 <b>files</b> 40:5 <b>final</b> 74:15 <b>financially</b> 109:17 <b>fine</b> 82:15 <b>finish</b> 100:25 <b>finished</b> 107:18 <b>finishes</b> 29:19 <b>firm</b> 18:3 <b>first</b> 19:6 37:19 46:3 56:18 61:18 64:9 67:15 70:23 73:25 <b>five</b> 33:23,25 34:3 40:21,21
<b>f</b>			
<b>fabulous</b> 18:4 19:12 23:8 25:25 26:16,21 36:24 39:17 45:7 96:24 <b>face</b> 100:13 <b>facebook</b> 1:3 2:3 4:14 5:4 6:4 9:10 13:12,16,24 14:2,12 15:3,8 15:15,16,21,23 16:17,18,19 17:5 17:15,23 21:17 22:3 24:13,18,24 25:1,6 26:6,8,14			

HIGHLY CONFIDENTIAL

[five - gould]

72:9,11 84:5 106:10 <b>flag</b> 58:14 94:17 <b>floor</b> 6:17 <b>fmiles</b> 6:11 <b>folks</b> 84:15 <b>followed</b> 29:2 <b>following</b> 63:20 63:24 <b>follows</b> 12:3 110:8 <b>foregoing</b> 109:5 109:7,11,13 112:2 <b>forgive</b> 34:22 <b>form</b> 19:21 20:13,23 21:19 22:5 28:8 30:18 31:20 32:22 34:16 37:4 48:13 64:25 65:13 71:21 <b>formally</b> 14:11 <b>former</b> 14:22 <b>forth</b> 109:7 <b>forward</b> 45:14 87:5 <b>found</b> 59:2 <b>four</b> 17:1 <b>frame</b> 81:8,9,12 81:18,18,21,22 <b>frames</b> 91:8 <b>francine</b> 6:23 10:1 <b>francisco</b> 4:21 <b>frcp</b> 111:1 <b>free</b> 69:11 82:24	<b>friends</b> 88:2 98:8 <b>function</b> 71:13 <b>further</b> 45:16 109:13,17 <b>future</b> 15:17  <b>g</b> <b>game</b> 46:21,21 51:13 <b>garden</b> 4:8 <b>garrie</b> 6:14 10:12,13 106:1,4 106:7 107:4,7,16 107:25 108:5 <b>gathers</b> 69:5 <b>gee</b> 16:2 <b>gen</b> 35:6 <b>general</b> 6:23 28:19 34:21 38:10 53:20 <b>generally</b> 32:20 53:17 54:5 <b>generating</b> 35:6 <b>gentle</b> 15:25 <b>gentleman</b> 15:24 15:25 <b>geographic</b> 28:2 <b>geography</b> 61:21 61:24 64:11 <b>getting</b> 32:5 36:22 97:16 <b>giant</b> 54:4 <b>gibson</b> 4:15 5:5 6:5 9:23 16:4 <b>gibsondunn.com</b> 4:23,24 5:13,14 5:15,23 6:11 110:2	<b>give</b> 11:2 32:8 50:12 65:14 68:23 83:6 85:22 <b>given</b> 24:8 28:7 29:6 31:5 48:1,1 48:1 62:17 74:22,22 80:5 109:12 <b>global</b> 33:22 <b>glossing</b> 58:23 <b>go</b> 13:4 18:6 20:10 21:23,24 23:15 25:16 27:16 30:22 35:10 39:18,21 41:3,9 42:7 45:2 46:1 49:1 55:25 58:11,12 68:5 69:16 77:11 79:1 84:10,16 95:1 106:9,11,12 107:7,20,23 108:5 <b>goes</b> 17:4 30:1 37:18 51:17 <b>going</b> 14:25,25 17:19,20 20:3,21 27:17 34:8,13 35:5,14 38:12,17 42:21 43:14 44:12 46:1,23 53:4 54:3 59:10 64:25 65:12 66:13 67:25 77:13 78:22 84:1 85:22	88:16 89:13 90:23 91:15,25 91:25 92:1 105:20 106:8,9 106:10 <b>good</b> 12:7 74:20 84:2 <b>gotcha</b> 18:18 <b>gould</b> 3:6 7:5 9:17,18 10:20 12:6,8 13:3 18:4 18:9,21 19:8,25 20:14 21:3,6,13 21:22 22:9,13 23:8,10,14,17,20 25:16,21,22 28:13 30:25 31:14,25 32:10 33:4 34:22 35:23 37:8 38:20 39:3,4 40:4,8,12,20,24 41:9 44:23 45:2 45:9,17,23 48:18 49:7 50:15 51:11 52:9,23 53:8,12,23,25 54:9 55:22,25 56:5 59:18,20 60:11,19,22,23 61:7,12,15 63:13 63:18,21 65:19 65:21 67:6,11,13 70:7,13 71:25 72:1,22 73:1,3 73:15,22 76:13 76:21 77:12,21 78:16 79:14,19
--	---	---	---



HIGHLY CONFIDENTIAL

**[gould - insult]**

80:1,11 83:25 84:4,9,13,23 87:7 91:24 94:20 95:3,6,18 98:17 100:23 101:5,11,19 104:18,20 105:4 105:12,23 106:3 106:19,22 107:2 107:18,21 <b>grand</b> 6:8 <b>grant</b> 5:17 9:25 <b>great</b> 15:18 19:1 20:17 21:7 22:13 25:4,14 36:16 53:8 73:2 74:14 82:8 98:1 <b>gritty</b> 94:14 95:5 <b>ground</b> 12:11 <b>group</b> 88:23 <b>groups</b> 43:3 89:8 <b>guess</b> 22:12 78:25 <b>guessing</b> 44:12	<b>happy</b> 49:16 59:25 84:5 <b>hard</b> 84:7 <b>head</b> 36:9 42:9 83:10 <b>heading</b> 88:14 89:2 102:22 <b>held</b> 17:17 <b>help</b> 42:17 65:14 72:25 77:20,24 <b>helpful</b> 21:6 22:13,22 40:25 47:7 51:23 53:22 59:24 65:15 71:22 72:20 84:12 95:15 <b>herbert</b> 5:7 9:25 <b>hereto</b> 19:4 25:20 45:22 56:4 61:11 63:17 67:10 70:12 73:20 <b>hesitant</b> 55:21 <b>hesitate</b> 30:20 33:16 <b>hesitation</b> 33:11 <b>hey</b> 68:5 <b>highly</b> 1:10 107:10 <b>hold</b> 18:2 <b>holding</b> 84:6 <b>honestly</b> 28:16 50:11 80:17 <b>hope</b> 14:14 <b>hour</b> 84:2,10 <b>hours</b> 34:3 47:20 48:2,23 49:12,14	49:17,19,21 50:15,17,19,21 50:23 51:19 52:2,9,17,21 53:14 54:11,14 55:4,12,16 56:23 71:4,8,15,18 79:8 81:3,6,17 <b>hrs</b> 71:1,7 <b>huh</b> 90:14 [REDACTED] [REDACTED] [REDACTED] <b>i</b> <b>i.e.</b> 96:14 <b>idea</b> 33:2 34:20 34:21 <b>identification</b> 19:3 25:19 45:21 56:3 61:10 63:16 67:9 70:11 73:19 <b>identified</b> 45:12 60:25 94:10 <b>identify</b> 9:15 <b>imagine</b> 33:21 97:11 <b>immediately</b> 17:9,11 18:15 71:17 73:4 <b>impact</b> 21:5 <b>impacted</b> 60:4 <b>implies</b> 96:17 <b>important</b> 12:12 27:17 38:13,17	<b>include</b> 24:23 25:5 48:11 57:6 57:8 58:7 59:16 68:21 82:9 85:6 85:10 91:1,2 <b>included</b> 49:18 50:17 57:1 82:5 82:6 84:25 85:1 86:24 100:9 102:4 110:14 111:3 <b>includes</b> 56:24 85:15 89:11 91:3 <b>including</b> 44:5 89:7 104:24 105:4,16 106:23 <b>increase</b> 55:12 <b>independent</b> 72:14 86:12,25 <b>indicated</b> 22:21 <b>individual</b> 13:25 <b>information</b> 13:9 23:2 24:4,5 29:1,1 49:5 92:5 92:18 98:2 <b>infrastructure</b> 22:25 90:15,17 91:18 <b>inherently</b> 96:20 97:2 <b>insanely</b> 12:18 <b>insert</b> 91:16 <b>insofar</b> 32:13 83:18 <b>instruct</b> 105:7 <b>insult</b> 12:19
<b>h</b>			
<b>h</b> 7:8 8:1 113:3 <b>half</b> 17:1 <b>hand</b> 10:23 16:14 <b>handful</b> 14:18 <b>handled</b> 110:8 <b>hang</b> 108:2 <b>happen</b> 106:8 <b>happened</b> 14:11 105:9 <b>happens</b> 16:22 29:25			

HIGHLY CONFIDENTIAL

[insulted - live]

<b>insulted</b> 12:24	<b>jamsadr.com</b> 6:20	18:22,24 19:9,23	<b>layperson</b> 85:23
<b>integrated</b> 48:25	<b>january</b> 14:7	22:22,25 23:1,3	<b>lead</b> 65:13
<b>intelligence</b> 12:20	17:19	23:3 25:22	<b>leave</b> 62:12
<b>intended</b> 14:6	<b>job</b> 1:24 110:5	28:11,14,16	107:19
<b>intents</b> 83:1	113:2	30:21,23 35:25	<b>left</b> 71:22
<b>interacted</b> 13:11	<b>john</b> 6:25 9:12	36:1,18 44:11,16	<b>leftover</b> 83:2
<b>interacting</b> 29:4	<b>joined</b> 9:24	44:21 45:5 50:9	<b>legal</b> 29:3 110:7
<b>interactions</b> 91:20 92:7 93:5	<b>jsc</b> 1:4 2:4	52:16 53:12,18	<b>level</b> 33:22 54:19
97:23 102:21	<b>july</b> 1:16 2:18	53:20,21 54:1,3	103:13
<b>interested</b> 109:18	9:2,8 109:21	54:14 57:25	<b>liked</b> 98:16
<b>internal</b> 28:25	110:3,5	58:13 65:6	100:4
31:23	<b>k</b>	66:24 67:3 69:1	<b>likes</b> 62:17 63:4
<b>internally</b> 31:8	<b>kang</b> 16:1	72:12 78:21	76:1 93:18
<b>interplay</b> 83:22	<b>keep</b> 22:7 52:20	79:14 80:17	97:22 100:6
<b>interpreted</b> 96:1	53:13 54:10,13	83:3,9,24 84:12	<b>likewise</b> 81:22
<b>interrupt</b> 40:15	79:19,22	86:16,20 91:19	97:1
<b>interrupting</b> 77:10	<b>keeping</b> 21:17	92:2,19 94:15	<b>limited</b> 81:8,17
<b>introduced</b> 19:6	22:4	95:1,8,9,12,12	81:21
<b>involve</b> 65:7	<b>keeps</b> 53:3 80:12	95:15 97:20	<b>line</b> 29:14
<b>involved</b> 26:9	<b>keller</b> 3:5 4:5	98:24 99:3	110:15 111:4
52:11	9:19,21	100:6 101:14,14	113:4,7,10,13,16
<b>involves</b> 54:18	<b>kellerrohrback...</b> 3:15,16,17,18	101:15 102:5,6,7	113:19
54:22 97:2	4:12	102:8	<b>litigation</b> 1:4 2:4
<b>ip</b> 28:2	<b>kelly</b> 5:7 9:25	<b>known</b> 14:12	9:11 110:4
<b>ipad</b> 43:21	<b>kherbert</b> 5:14	<b>knows</b> 86:17,20	113:1
<b>issue</b> 60:16	<b>kid's</b> 51:12	<b>l</b>	<b>little</b> 13:18 20:1
94:14	<b>kids</b> 41:20 51:12	<b>l</b> 1:21 2:20 109:1	42:18 60:15
<b>issues</b> 15:5	<b>kind</b> 32:13 38:12	109:24	65:15 84:2
<b>items</b> 66:5	51:9 53:19,20,23	<b>l.i.p.</b> 3:5 4:5	<b>live</b> 41:23 46:18
<b>j</b>	60:8 76:11 88:5	<b>label</b> 30:20	46:19,20,23 47:1
<b>j.c.</b> 89:17	91:18 100:14,17	<b>labeled</b> 56:20	47:1 57:6 67:22
<b>jams</b> 6:13	100:18	<b>language</b> 30:21	67:23,24,25,25
	<b>kinds</b> 20:7	<b>laptop</b> 56:10	68:5,7,8,9,10,13
	<b>know</b> 12:11,14	<b>larry</b> 83:8,9,11	71:8,12,13,15
	12:17 13:6	<b>laufenberg</b> 3:8	72:2,8 88:11,12
		<b>law</b> 3:10 4:7,18	88:16,20,20,21
		5:9,18 6:7 12:21	94:25 96:25
			97:6,12

HIGHLY CONFIDENTIAL

[llp - moving]

<b>llp</b> 4:15 5:5 6:5 <b>loaded</b> 18:14 <b>loading</b> 40:17 <b>located</b> 2:16 <b>location</b> 1:15 27:18,22 28:3 47:17 90:20 <b>locked</b> 56:10 110:12 111:1 <b>loeser</b> 3:7 <b>long</b> 14:10 16:25 30:8 72:9 <b>look</b> 29:13 30:6 33:1 36:3 58:17 65:23 78:19 <b>looked</b> 14:20 82:7 85:2 <b>looking</b> 29:1 35:19 37:15 39:7 76:12 91:4 <b>los</b> 6:9,18 <b>lot</b> 14:11 18:13 20:2	<b>master</b> 6:15 10:12,13 22:21 106:1,4,7 107:4 107:7,16,25 108:5 <b>math</b> 17:19 <b>matter</b> 9:10 38:11 <b>mcqueeney</b> 5:8 10:2 <b>md</b> 1:4 2:4 <b>mdl</b> 1:3 2:3 7:12 7:15,18,21,24 8:5,8,11,14 <b>mean</b> 12:19 14:2 15:10 19:24 20:15,16 30:15 32:15 33:1,20 34:9 36:2,6,19 48:19 50:23 51:12,22 64:23 64:23 74:25 77:3,22,22,23,25 78:2,17 82:12 85:21 87:15 88:4 89:15,16,23 90:12 94:24 102:3,18,24 <b>meaning</b> 62:2 74:11 87:20 <b>means</b> 47:14,16 60:12 71:3 83:7 92:14,17 <b>meant</b> 46:8,10 92:18,20 <b>measure</b> 65:21 76:2,2 77:15 78:8 93:3	<b>measured</b> 64:21 65:11 <b>measurement</b> 16:23 80:16 <b>measures</b> 75:3,5 76:6 79:15 <b>measuring</b> 16:22 17:4 76:23 80:18 <b>mechanics</b> 91:12 <b>megabytes</b> 65:3 77:4,25 <b>members</b> 29:20 <b>mentioned</b> 46:19 66:14 95:23 <b>messaging</b> 24:10 24:12,14 <b>messenger</b> 24:7 24:10,12,19,24 25:1 41:17,21,25 42:4,19,25 43:6 44:4 <b>meta</b> 6:24 10:1 14:2,12,22,23 15:3,10,12,20 24:13 32:11 <b>metadata</b> 25:11 <b>methodology</b> 29:16 <b>metkar</b> 16:2 <b>metric</b> 49:2 54:3 62:5 64:21,23 65:8,10 76:11,14 81:4 <b>metrics</b> 44:20 53:19 54:13,15 75:21 76:2 86:20,22,24 96:4	101:24 102:12 102:14,15 103:5 103:7,9,16,19,25 104:7,9,12 <b>michael</b> 1:13 2:15 5:8 7:3 9:9 10:2 12:1 110:5 112:1,13 113:2 113:24 <b>microsoft</b> 89:21 <b>midnight</b> 57:4 <b>miles</b> 6:6 10:2 <b>millar</b> 94:12,20 <b>mind</b> 14:24 15:2 79:2 81:2 91:24 <b>minimize</b> 37:2 <b>minute</b> 40:18 72:11 84:5 100:24 <b>minutes</b> 40:22 72:9,12 106:10 <b>mission</b> 4:19 <b>mistakenly</b> 59:8 <b>mmcqueeney</b> 5:15 <b>modern</b> 49:1 <b>moment</b> 18:8 <b>morning</b> 12:7 <b>mountain</b> 9:7 <b>move</b> 16:15 58:13 61:12 70:8 <b>moves</b> 88:19 <b>moving</b> 63:13 67:6,11 73:16 75:20
<b>m</b>			
<b>m</b> 5:6 <b>macdonell</b> 6:25 9:12 <b>machine</b> 109:10 <b>maggie</b> 16:2 <b>marked</b> 8:17 13:2 19:2 25:17 25:18 45:20 46:1 56:2 61:9 63:15 67:8 70:10 73:18 <b>marketing</b> 17:13			

HIGHLY CONFIDENTIAL

[n - okay]

<b>n</b>	<b>noticing</b> 9:16 10:18	69:10,10,14,20 79:25 80:3 81:11,20 82:7 85:1 96:3 98:9 99:4,7,10 102:20 103:11,12	17:14,25 18:4,4 18:6,18 19:8,12 19:16 20:17 21:3 22:13 23:14,20 24:4 25:4,14,25 26:16 26:21 28:5,17 30:10 33:10 36:3,5,8,10,24 37:16 38:2,10,20 39:3,17,21,22 40:7 41:4,23 42:2,6,16 43:25 44:9,14,14,23,23 45:2,19,25 47:7 47:23 48:11 51:21 52:14,20 53:25 54:9,17 55:3,11,25 56:5 56:11,12,16 57:11,20,25 58:11 59:3,18 60:19 61:3,7 62:15,20 63:2,13 63:13,24 64:5,6 64:16 65:20 66:24 69:1,5,13 69:16,18,19 70:21 71:6 72:6 72:7,19,22 73:7 73:15,21 74:10 75:10,14,20 76:5 76:21 78:6 79:7 81:1,7,11 83:11 83:25 84:6,11,18 85:5,14 89:6,10 89:18 92:4,13,16 93:4,6,10,10,23
<b>n</b> 7:1 <b>name</b> 12:8 98:22 109:21 <b>named</b> 15:24,25 <b>names</b> 98:9 <b>native</b> 7:11,14 7:17,20,23 8:4,7 8:10,13 <b>nature</b> 94:19 105:20 <b>necessarily</b> 19:23 94:13 <b>necessary</b> 110:14 111:3 <b>need</b> 30:12 60:14 88:22 <b>neither</b> 109:17 <b>nevada</b> 1:22 <b>never</b> 81:2 <b>new</b> 5:11,11 65:16 <b>night</b> 57:14 <b>nitty</b> 94:14 95:5 <b>nods</b> 36:9 83:10 <b>nomenclature</b> 42:9 <b>nonattorney</b> 105:22 <b>northern</b> 1:2 2:2 <b>notating</b> 110:15 111:4 <b>note</b> 10:3 94:9 <b>noted</b> 107:16,17 108:9 <b>notes</b> 112:4 <b>notice</b> 58:19 102:7	<b>number</b> 7:9 8:2 8:18 18:7,25 23:18 24:6 27:16 29:18 30:11,11 31:7 35:7,7,9,19 37:14 48:2 49:6 57:2,13,15,21 58:20 61:14 63:19 66:3,6 67:12 68:21 70:9 72:11,14 73:17 74:21 78:13 79:4 80:10 98:25 99:15,18,25 100:4,19,21 110:15 111:4 <b>numbers</b> 19:20 20:2,3,6,21,25 21:5,12,21 22:1 22:4 29:13,14 30:16 31:3,10,18 31:22,22 32:2,13 32:15,19,20 33:1 33:12,14,19,20 34:8,9,10,12,15 35:4,4,6,13,16 35:19,20,22 36:12,20 37:1,18 37:24 38:11 39:5,14,23 44:21 53:3,7 54:18 55:7,20 57:21 58:7 61:4 62:11 62:16 65:5,25	<b>numerator</b> 78:15 79:9 <b>o</b> <b>o0o</b> 9:4 <b>oath</b> 10:17 12:2 109:9 <b>object</b> 19:21 20:13,23 21:19 22:5,5 28:8 30:18 31:20 32:22 34:16 37:4 44:18 48:13 65:12,17 71:21,21 <b>objection</b> 10:16 10:20,21 38:15 38:23 55:18 79:21 87:2 91:16 <b>obtained</b> 13:10 <b>obviously</b> 14:10 <b>october</b> 17:18 <b>office</b> 110:11 <b>officer</b> 10:16 <b>oh</b> 21:23 56:8 71:25 84:9 107:7 <b>okay</b> 9:6 10:8,11 13:8,20,23 14:10 14:24 15:18 16:11,15 17:2,7	

[okay - point]

94:2,20 95:3,6 96:13 97:18,21 98:1 100:17 101:2,3,6 103:3 104:3,18 106:7 106:14 108:7 <b>omissions</b> 36:7 36:15 37:3 38:4 38:8,14,18,21 39:4,11,15 40:2 55:5,9 58:15 60:24 61:5 69:11,14,22 70:1 73:9,13 75:15,18 <b>once</b> 107:12 <b>ones</b> 16:11 42:7 <b>open</b> 21:15 45:5 73:21 76:10 <b>operates</b> 82:20 <b>order</b> 86:11,23 87:23 <b>oregon</b> 1:22 <b>organization</b> 88:23 89:15 <b>organizations</b> 43:3 89:7 <b>original</b> 109:14 110:10,21 <b>originally</b> 82:23 <b>outside</b> 27:25 47:15 52:22 79:17 80:7 83:18 86:13 87:1 91:16 97:17,19 101:18	<b>p</b> <b>p.m.</b> 84:19,22 101:7,10 106:15 106:18 108:8,9 <b>page</b> 7:3,9 8:2,18 13:5 43:5,14 88:24,24 89:4,22 89:24 92:1,3,5 110:15 111:4 113:4,7,10,13,16 113:19 <b>pages</b> 1:25 43:4 89:8 110:14,17 110:17 111:3,6,6 <b>park</b> 5:10 <b>part</b> 37:19 43:18 49:9,13 96:21 <b>particular</b> 51:5 <b>parties</b> 3:2 4:2 5:2 6:2 101:16 107:19 <b>partner</b> 71:9 <b>parts</b> 37:17 <b>party</b> 29:5 48:12 48:16 109:19 <b>password</b> 56:9 <b>pause</b> 22:18 53:15 54:7 <b>pay</b> 82:16,17 <b>pct</b> 64:17 66:25 69:17 <b>pdf</b> 110:12 111:1 <b>penalty</b> 11:1 110:16 111:5 112:2 <b>penney</b> 89:17 <b>people</b> 14:18,21 29:17 35:5 48:2	83:14,14 99:18 99:22 <b>percentage</b> 64:19 65:2,4,10 65:22,24 <b>period</b> 14:6,10 14:15 110:18 111:7 <b>perjury</b> 11:1 110:17 111:6 112:2 <b>permissions</b> 88:21 <b>person</b> 22:10 23:7 46:24 55:20 87:22 <b>person's</b> 30:9 <b>personally</b> 16:7 <b>persons</b> 99:4,8 99:25 100:4 <b>perspective</b> 90:23 <b>pertains</b> 109:13 <b>phone</b> 42:20 43:21 47:3 <b>phonetic</b> 16:2 <b>photos</b> 66:10 <b>phrase</b> 32:6 33:17 98:15 <b>physically</b> 90:18 <b>picture</b> 34:13 35:14 <b>piece</b> 51:5 86:2 98:3 <b>pieces</b> 66:4,6,18 <b>place</b> 33:24 37:9 37:12 89:25 109:6	<b>places</b> 89:10 <b>plain</b> 29:2,5 <b>plaintiffs</b> 2:16 3:4 4:4 9:17 <b>planning</b> 44:24 <b>platform</b> 13:12 13:12 17:5 24:18 34:14 35:15 42:12 43:9,19,22 44:5 46:17 48:22 51:7 57:9,18 66:19,22 68:14 68:20 71:19 72:3 75:4,7 76:7 76:16 77:1,17,18 78:10 79:16 80:5,13,20 82:6 82:24 83:3 87:1 90:7,8,24 91:1 96:9,15 97:1,6 97:13 98:20 101:12 <b>platforms</b> 6:24 51:15 <b>playing</b> 41:23 <b>please</b> 9:15,16 10:19,23 12:14 18:8 21:24 49:15 62:21 76:18 77:21,21 81:14 85:8,24 99:6 106:13 <b>plus</b> 68:24 <b>point</b> 14:14 15:17 18:19 29:24 33:15 41:13 56:21
--	--	---	---



[point - put]

80:9 <b>pointing</b> 58:25 <b>points</b> 27:19 <b>portion</b> 13:20 <b>portrayal</b> 28:6 <b>position</b> 16:16 16:25 17:3,9,10 17:11,17,22,25 18:2 <b>possibilities</b> 47:11 <b>possible</b> 12:10 24:17 61:23 62:7 64:13 74:4 80:22 81:4 <b>post</b> 65:5 66:15 66:16 <b>posted</b> 66:21 <b>posts</b> 65:6 66:14 <b>potential</b> 38:20 <b>practicable</b> 35:14 63:11 <b>predates</b> 96:12 <b>predicted</b> 27:22 47:16 <b>preliminary</b> 19:17 <b>prep</b> 59:1 <b>preparation</b> 26:2 <b>prepare</b> 14:16 93:11 <b>prepared</b> 12:23 19:19 20:20 21:16,21,23,25 22:16 26:5 44:20 53:2,7 58:4 92:24 93:2	93:6,11,23 94:2 94:6 95:20 96:5 97:21 101:21,22 101:23 102:9,11 102:15 103:4,7 103:11,12,15,19 103:23 104:5,6,9 104:11,15 <b>present</b> 6:22 14:7 <b>presented</b> 20:25 <b>press</b> 14:19 <b>presume</b> 24:21 25:17 28:1 <b>pretty</b> 76:10 <b>previous</b> 26:5 28:21 71:18 73:4 <b>previously</b> 8:17 13:2 <b>primarily</b> 27:24 66:15 <b>principal</b> 18:3 <b>principally</b> 28:2 <b>prior</b> 17:9,11 27:5 68:8 109:8 <b>privacy</b> 9:11 88:9,25 <b>privilege</b> 106:5 <b>privileged</b> 105:8 <b>probably</b> 12:15 16:15 30:8 34:17 84:10 100:25 <b>problem</b> 86:19 <b>problematic</b> 30:22	<b>procedure</b> 110:19,20 <b>proceedings</b> 109:5,8,9,15 <b>process</b> 28:19,23 29:2,17 31:3,3,6 31:11,19 32:1,2 35:5,21,24 36:11 36:13 37:6,11,13 49:10 57:20,22 69:6 87:17 90:3 97:3,4 <b>processes</b> 54:19 <b>produce</b> 29:18 31:7,8 32:1,2 34:14 35:4,13,20 35:22 36:12 37:24 59:15,21 80:3,22 81:5,13 81:16 103:24 104:12 <b>produced</b> 29:23 31:11,19,23 35:16 36:20 70:18 80:10,16 81:10,22 96:4 <b>producer</b> 51:2 <b>produces</b> 34:15 35:12 36:25 54:17 <b>producing</b> 61:4 69:19 <b>product</b> 16:24 21:1 97:17 <b>production</b> 38:11 <b>professional</b> 2:21 109:2	<b>profile</b> 1:4 2:4 9:11 41:20 42:11 110:4 113:1 <b>prominent</b> 43:13 <b>proper</b> 42:9 <b>proportion</b> 76:25 78:9 79:23 <b>proposed</b> 9:18 <b>provide</b> 63:11 98:4 <b>provided</b> 16:3 110:19 111:8 <b>pub</b> 89:3 <b>publish</b> 87:19 <b>published</b> 51:1 57:3,14 87:4,10 87:11,12,12,24 87:25 88:8,17 89:23 <b>publisher</b> 82:16 <b>publishing</b> 88:15 89:3,12 90:1 <b>pull</b> 35:3,10,11 <b>pulled</b> 29:17 35:8 52:12 54:3 <b>purport</b> 39:5 <b>purpose</b> 16:24 31:6,25 32:1 <b>purposes</b> 15:3 27:13 66:5 <b>push</b> 60:2 <b>pushing</b> 86:14 <b>put</b> 30:20 37:11 45:14 56:9 64:25 68:19 87:5 92:21
--	---	---	--

HIGHLY CONFIDENTIAL

[put - representative]

102:23	<b>r</b>	<b>recess</b> 41:6	96:3 101:24
<b>putting</b> 16:23	<b>r</b> 6:6 113:3,3	84:20 101:8	102:12,14,16
75:24 102:6	<b>r&amp;s</b> 111:1,9	106:16	103:5,8,16,20
<b>q</b>	<b>raise</b> 10:23	<b>record</b> 9:7 10:15	104:7,10
<b>qualify</b> 35:1,2	<b>range</b> 14:8	12:13 21:8	<b>relates</b> 1:6 2:6
<b>qualitative</b>	<b>raw</b> 36:19 37:1	22:14 41:5,8	83:19
55:22	37:11,15,17,20	44:25 53:9	<b>relating</b> 13:9
<b>quantitative</b>	37:24 38:3,7	71:14 84:19,22	<b>relation</b> 93:20
55:23	54:23 55:1 59:4	101:6,10 106:9	<b>relationship</b>
<b>query</b> 29:10,11	80:15	106:12,13,15,18	93:17
<b>question</b> 12:13	<b>reactions</b> 62:24	107:17 108:6,8	<b>relative</b> 76:25
23:9 27:15	62:25 100:7,8,9	109:9,12	77:17 109:18
28:14,15 34:7	100:14,17,18,20	<b>recorded</b> 47:2	<b>released</b> 110:21
45:10 49:15	100:21	68:12 71:13,14	<b>releases</b> 14:19
50:14 53:22	<b>read</b> 25:12 112:2	71:16	<b>relevant</b> 95:10
63:5,24 64:24	<b>reading</b> 110:23	<b>recording</b> 68:5,6	<b>reliable</b> 31:19
65:16 74:20	111:9	68:13	33:11
76:9,19 77:9,19	<b>reads</b> 13:8 92:5	<b>records</b> 92:5,18	<b>relied</b> 32:2,6,6
78:24 79:11	<b>reality</b> 32:21,25	<b>redirect</b> 107:5	<b>rely</b> 31:10
81:24 82:8 85:3	<b>realize</b> 13:23	<b>refer</b> 15:19	<b>remember</b> 16:11
86:17 98:12	<b>really</b> 16:13	23:20 41:16	85:3
102:10 105:11	28:11 44:19	<b>referenced</b> 110:6	<b>remind</b> 23:17
105:24 106:5,19	49:9 58:4 91:12	<b>referred</b> 15:2	<b>remote</b> 10:17
<b>questioning</b>	97:17,19,19	<b>reflect</b> 26:18	<b>remotely</b> 1:14
14:13	<b>reask</b> 102:10	33:2,4,8 34:12	2:18 109:6
<b>questions</b> 12:18	105:23 106:19	<b>reflective</b> 32:21	<b>removed</b> 72:23
19:17 45:13	<b>reason</b> 15:6	32:25	<b>reported</b> 1:14,20
69:19 92:13,16	26:17 97:8	<b>refresh</b> 18:16	2:19
94:18 95:4,5	113:6,9,12,15,18	<b>regarding</b> 86:22	<b>reporter</b> 2:20,21
<b>quick</b> 100:24	113:21	92:6	2:22 9:14 10:5
<b>quicker</b> 77:6,6	<b>reasonability</b>	<b>regardless</b> 86:7	10:14,22,25 19:3
<b>quickly</b> 12:10	29:13 30:2,4,15	<b>registered</b> 2:21	25:19 45:21
100:25	59:11	109:1	56:3 61:10
<b>quite</b> 25:15	<b>reasonable</b> 30:9	<b>related</b> 10:5	63:16 67:9
58:20 60:1	30:11 31:5 59:9	16:14 17:4 23:6	70:11 73:19
	59:10	48:15 54:15	109:2,3,3
	<b>rebecca</b> 1:21	76:2,24 77:16	<b>representative</b>
	2:20 109:1,24	78:7 87:5 96:2,2	1:13

HIGHLY CONFIDENTIAL

[represents - see]

<b>represents</b> 24:6 27:6	61:15 63:21 69:13 70:13 107:13 109:15 110:8,10,13 111:2	<b>rpr</b> 1:21 109:24 <b>rring</b> 4:24 <b>rules</b> 12:11 111:8 <b>run</b> 29:11	55:18 59:18,19 59:23 60:13,20 65:12,20 71:21 72:19,24 76:9,19 77:2,5,9,19 78:11 79:11,17 79:21 80:7 83:18 84:1,6,11 84:14 87:2 91:15 94:9,23 95:4,7 98:12 100:23 101:3,18 105:2,6,19 106:10 107:4,6,9 107:24 108:3 110:1
<b>request</b> 28:25 29:3,5,7	<b>reviewed</b> 14:19 16:13 20:4 32:16 34:10 39:14,23 56:13 70:18 75:20	<b>s</b>	<b>s</b> 7:8 8:1 113:3 <b>sales</b> 17:12 <b>san</b> 4:21 <b>santa</b> 4:10 <b>save</b> 46:24 68:18 <b>saved</b> 96:25 97:6 97:13 <b>saving</b> 97:1,3 <b>saw</b> 68:8 74:12 <b>saying</b> 28:5 32:24 46:9 <b>says</b> 74:15 <b>scanned</b> 16:12 <b>scene</b> 48:3 <b>schedule</b> 110:10 <b>schwing</b> 4:16 9:22,22 10:8,11 10:21 18:10,13 19:21 20:13,23 21:9,19 22:5,14 22:18 23:9,10,11 28:8 30:18 31:12,20 32:4,22 34:16 35:17 37:4 38:15,23 40:11,14,21 41:1 44:18 45:9,19 48:13 49:3 50:12 51:10 52:4,7,22 53:5 53:15 54:1
<b>requested</b> 13:10 109:16 111:1,9 111:10	<b>reviewing</b> 32:19 69:24 70:2,6 73:11 75:17		<b>scope</b> 44:18 52:22,22 53:23 79:17 80:7 83:18 91:17 101:18 <b>screen</b> 10:4 13:4 <b>sears</b> 89:19 <b>seattle</b> 3:13 <b>second</b> 24:1 37:13,23 40:16 50:13 56:7,20 64:11 67:17 68:23 70:25 74:2,21,24 75:5 <b>seconds</b> 75:1 100:1 <b>see</b> 18:20 25:21 29:15 34:5 40:8 42:21 43:2,21 45:24 72:12 79:7 83:6,14,14 86:10 92:4
<b>requesting</b> 29:23	<b>right</b> 10:23 13:17 23:7 25:3 25:10,10,15,24 27:6 29:10 33:6 35:2 39:8 42:6 43:6,20 45:4 46:22 49:7,14 50:5 57:9 60:21 65:4 66:15 70:23 75:12 84:11,16 94:24 98:15 105:6 106:5		
<b>resolve</b> 60:21			
<b>resolves</b> 27:22			
<b>resources</b> 21:17 22:3,7,11			
<b>respect</b> 91:23			
<b>respectfully</b> 59:20			
<b>responsible</b> 16:21			
<b>rest</b> 25:6 27:7 47:12,14 55:13 58:8 61:24 62:18 63:25 64:13 68:22,25 73:5 74:5			
<b>restate</b> 75:23 77:13			
<b>results</b> 28:6 29:11,12	<b>ring</b> 4:17 9:25 <b>rohrback</b> 3:5 4:5 9:19,21 <b>role</b> 15:6,7 <b>romano</b> 1:21 2:20 109:1,24 <b>room</b> 41:3 <b>rose</b> 9:25 <b>rosemarie</b> 4:17 <b>ross</b> 5:19 <b>row</b> 65:24 80:22 80:23		
<b>retrieval</b> 37:23 38:6 54:25 55:2			
<b>retrieved</b> 93:24 94:3			
<b>return</b> 110:17 111:6			
<b>reveal</b> 105:20			
<b>review</b> 16:7 19:13 26:2 29:20 39:10 55:7 59:1 60:25			



[see - spreadsheet]

<p>94:25  <b>seen</b> 38:22 64:1  76:15 99:11  <b>selects</b> 37:2  <b>self</b> 27:18  <b>sends</b> 24:2,5,22  27:3,4 31:24  33:22,23,24 34:2  39:5 41:13  <b>senior</b> 29:20  <b>sense</b> 30:16 60:8  84:7  <b>separate</b> 42:19  42:21  <b>server</b> 95:9  <b>set</b> 14:19,20  33:23 37:1  54:13 63:10  88:8,22 109:6  <b>settings</b> 88:9,9  88:25  <b>sgrant</b> 5:23  <b>shaquille</b> 5:17  9:25  <b>share</b> 13:4 18:11  68:6,18 87:18  95:17  <b>shared</b> 13:11  31:9  <b>shares</b> 88:2 94:8  <b>sharing</b> 92:7  93:5  <b>sheet</b> 47:19 70:2  70:3,6 71:9,11  <b>sheets</b> 78:20,23  <b>short</b> 101:4  <b>shorthand</b> 2:20  109:2,10</p>	<p><b>show</b> 18:15 39:5  62:11 71:18  72:6 73:4 74:17  <b>showed</b> 41:12  <b>showing</b> 10:4  19:9 80:4 83:12  <b>shown</b> 24:21  62:16 86:3  <b>shows</b> 72:1  74:18,21  <b>shweta</b> 16:2  <b>sign</b> 110:16  111:5  <b>signature</b> 109:23  110:21,23,23  111:9  <b>significant</b> 55:12  <b>significantly</b>  55:17  <b>similar</b> 69:19  79:9 83:5  <b>similarly</b> 52:16  <b>simple</b> 30:5 60:1  <b>simplest</b> 29:9  <b>simply</b> 89:25  <b>simpson</b> 15:25  <b>simultaneously</b>  60:10  <b>sitting</b> 76:13  <b>situation</b> 51:9  97:11  <b>size</b> 65:2  <b>skews</b> 59:13  <b>slightly</b> 85:19  <b>slip</b> 14:25  <b>smiley</b> 100:13  <b>soccer</b> 46:21</p>	<p><b>solely</b> 87:9  <b>solemnly</b> 10:25  <b>solutions</b> 110:7  <b>somebody</b> 26:13  27:14 52:5  66:16 88:4  89:16  <b>sorry</b> 21:23  31:17 33:6  40:15 41:1,1  50:1,12 51:22  52:5 71:25  75:23 77:2,5,6,8  81:14 82:14  105:25  <b>sort</b> 12:20 30:15  33:17 36:21  65:8 94:18  <b>sorts</b> 32:19  <b>sounds</b> 37:16  <b>south</b> 6:8  <b>speak</b> 15:23  22:24 27:21  29:25 39:11  49:9 50:8,9  52:12 53:18  54:5 58:3 59:24  59:25 67:2  82:25 87:4 90:3  90:5,18 91:12  94:13 96:11  103:7  <b>speaking</b> 57:22  60:10 69:6  <b>spec</b> 79:24  <b>special</b> 6:15  10:12,13 22:21  106:1,4,7 107:4</p>	<p>107:7,16,25  108:5  <b>specific</b> 14:13  20:1 32:9 54:1  76:11,22 98:4  99:12,19,23  102:16 103:12  <b>specifically</b>  13:12 14:15  88:8 100:11  <b>specifics</b> 60:15  <b>specifying</b> 14:8  <b>speculate</b> 22:12  44:13 48:15  50:7,25 52:19  78:25 79:13  <b>speculating</b>  26:11 28:12  78:5,22 79:24  80:9 82:1 83:2  83:22 97:10  <b>spend</b> 51:22  72:15 78:10  79:16 80:5  <b>spent</b> 48:2,23  49:12,17,21  50:16,19,21,23  78:9 79:23  80:12 102:19  <b>spoke</b> 14:18,21  14:23 15:24  16:1 18:1 57:22  74:8 105:10,22  <b>spoken</b> 44:3,4  69:7 76:16  <b>spreadsheet</b> 7:11  7:14,17,20,23  8:4,7,10,13</p>
--	---	--	--

## [spreadsheet - tables]

21:15 23:15,16 27:14 28:20 45:25 52:15 54:18 56:6,13 59:15 60:24 63:25 64:7 65:24 69:20,24 70:14,18,21 71:18 73:4,7,11 73:23 75:12,24 <b>spreadsheets</b> 26:18 32:16 38:22 41:10 64:1,2 70:17 75:21 76:1 82:4 84:24 <b>springer</b> 4:6 9:20 18:8,22,23 19:5 23:17,19 40:7,10 <b>springs</b> 1:15 2:17 9:1 <b>standpoint</b> 30:9 <b>stands</b> 47:5 <b>start</b> 13:1 17:7 37:8,10 39:9 40:5 65:16 78:16 91:10 <b>started</b> 18:1 <b>starting</b> 10:18 <b>starts</b> 90:2 97:16 <b>state</b> 11:1 44:25 46:5,8 48:1 74:10,12,23 110:9,12 <b>states</b> 1:1 2:1 <b>steamboat</b> 1:15 2:17 9:1	<b>stenographically</b> 1:20 <b>step</b> 24:16 52:23 <b>sticks</b> 58:20 <b>stipulation</b> 110:20 <b>storage</b> 37:20 38:3 54:22 93:7 94:14 95:22 96:17,20 97:2 <b>store</b> 23:1 80:15 90:11 98:2 <b>stored</b> 23:5 63:9 87:21 90:15,17 90:22,24 91:9,11 91:13 92:20,25 93:13,16,16,19 93:20 95:8,21,24 96:10,16,19,23 97:7,12,14,24,25 98:9,23 99:1,5,8 99:10,17,20,21 99:23 100:2,5,6 100:7,18,22 <b>stores</b> 90:8 91:6 98:13 <b>storing</b> 91:7,7,20 <b>strategy</b> 21:1 <b>stream</b> 57:6 72:8 72:11 88:16 <b>streamed</b> 67:24 68:1 71:15,18 72:3 96:25 97:6 97:12 <b>streaming</b> 41:23 46:18,20,20,22 46:23,25 47:1,1 68:9,9,10,17	88:20,20,21 <b>streams</b> 72:10 88:11,12 <b>street</b> 4:8,19 6:16 <b>strike</b> 106:12 <b>stuck</b> 32:5 <b>studio</b> 43:12,15 43:16 44:6,7,8,9 54:13 <b>stuff</b> 40:17 <b>stupid</b> 12:18 <b>subscribed</b> 109:21 <b>subset</b> 25:9 <b>substance</b> 104:21 105:1,13 105:18 106:24 <b>subtopic</b> 13:16 13:21 21:11 22:16 53:10 92:17 94:21 <b>subtopics</b> 92:10 107:22 <b>suffer</b> 39:6 <b>sufficiently</b> 20:11 <b>suggestion</b> 106:2 <b>suite</b> 3:12 4:9,20 5:20 <b>summarizing</b> 30:24 90:4 <b>super</b> 21:6 22:13 47:7 <b>support</b> 16:18 <b>supporting</b> 17:12	<b>suppose</b> 83:8,11 87:8 98:7 <b>sure</b> 16:13 19:25 22:9,19 31:1,14 32:10 34:23 36:2 39:2 43:25 46:11 49:16,16 51:3 53:1 55:22 56:8 58:6 60:1 60:22 65:19 66:12 78:16 79:3 80:24 81:15 84:4 87:7 89:20 91:10 95:10,14 98:6 99:12 103:14 106:20 <b>surprised</b> 12:24 <b>surrounding</b> 31:5 <b>swears</b> 9:14 <b>switches</b> 46:25 <b>system</b> 33:13 35:3,4 37:6 86:18,20 87:14 89:14 90:2 91:5 <b>systems</b> 16:23 31:23 63:10 90:21,21,23 91:2 91:4 96:2,3 97:14 98:10 103:24 104:12 <b>t</b> <b>t</b> 4:17 7:8 8:1 113:3,3 <b>tables</b> 23:4
--	---	---	---

HIGHLY CONFIDENTIAL

[tabs - today]

<b>tabs</b> 94:24	<b>tell</b> 15:21 64:18	<b>thank</b> 10:11 14:3	<b>thought</b> 29:16
<b>tagged</b> 59:8	100:8 101:19	14:3 23:10	<b>three</b> 30:7 40:18
<b>take</b> 39:1 40:18	<b>ten</b> 72:9,10 84:5	40:25 41:2 47:7	56:16 64:6
66:24 76:18	84:17 98:7	51:21 58:21,21	74:21,24 75:1,5
77:24 78:19	<b>tend</b> 42:15	58:24,24 62:22	100:1,24 104:4
81:25 84:4,16	<b>tenure</b> 96:13	64:5 75:8 107:2	<b>thursday</b> 1:16
100:24 101:3,4	██████████	108:3	2:18 9:2
106:10	<b>term</b> 36:17,18,19	<b>thanks</b> 18:5	<b>time</b> 9:7 10:14
<b>taken</b> 2:15 41:6	36:22 82:14	101:5	13:14 14:6,14
84:20 101:8	83:3	<b>thing</b> 27:6 60:8	15:17 18:24
106:16 109:5	<b>terms</b> 31:24	<b>things</b> 12:22	19:18 20:19
<b>talk</b> 12:12 21:21	53:23 77:23,25	23:4 53:20	29:24 33:14,15
21:25 22:10,22	90:20 94:23	64:23 65:1,2	33:20 34:15
53:7,10,10 58:4	95:15	68:3 77:13	35:10,16,21 39:2
60:18 85:20	<b>testi</b> 103:4	86:15 92:19	48:8 51:23
87:24 91:17	<b>testified</b> 12:3	93:13 104:4	52:25 54:16
102:15 103:11	80:11 81:16	<b>think</b> 13:1 18:21	72:15,18 76:18
103:12	<b>testify</b> 19:19	22:6,7,21 23:5	78:9 79:15,22
<b>talked</b> 41:10	20:20 21:10,11	23:11 26:17	80:4,9,12 81:8,9
47:17 54:19	21:16 22:16,16	28:14 29:9	81:12,18,18,21
61:1 81:1	53:2 92:10,24	32:23 33:10	81:22,25 84:2
101:11 104:4	93:2,7,12,19,23	34:19,20 37:5	92:23 95:19
<b>talking</b> 14:15	94:2,6,21 95:20	39:20 42:17,20	96:7,12,14 97:5
20:3,8,9,12,22	97:21 101:21,23	43:22,23 44:2	97:10 99:22
20:24 32:14,14	101:23 102:9,11	46:9 53:15,17,21	102:19 103:10
34:8,8 38:12	103:5,15,19,23	54:5 58:22	108:9 109:6
39:19 51:8,9	104:5,6,9,11,16	59:25 60:9,15	110:10,18,24
53:4 65:1,8	<b>testifying</b> 13:15	61:8 66:2,7,9,9	111:7
98:18 99:13,14	13:24,25 107:22	67:6,7 71:14,23	<b>times</b> 12:17
105:2	109:8	76:14 78:23	18:13
██████████	<b>testimony</b> 11:1	83:1,2,4 85:9	<b>tip</b> 18:11
<b>taxonomy</b> 66:8	14:5 85:5,9	87:17 91:4	<b>title</b> 25:12
<b>team</b> 16:21	104:20,22 105:1	98:14 100:23	<b>titled</b> 24:1 41:13
17:13 29:6,6,21	105:18 106:25	104:18 107:11	62:4 64:17
29:23	109:12 112:4	107:22	70:25
<b>technical</b> 29:8	<b>texas</b> 5:21	<b>third</b> 3:11 48:12	<b>today</b> 9:20 12:9
36:18 62:24	<b>text</b> 66:10,16	48:16 101:16	19:19 20:3,20,22
94:14,18 95:5			29:2 32:14,15

HIGHLY CONFIDENTIAL

[today - users]

33:23 34:1,9 37:15 38:12,22 53:2,4 56:14 60:11 61:16 63:22 64:1 70:18 95:16 96:5 101:21,23 101:23 102:9,11 104:16 105:16 <b>told</b> 12:16 <b>tomorrow</b> 34:1 <b>top</b> 92:4 <b>topic</b> 13:8 14:19 16:14 22:8 29:22 44:19 54:6 91:22 96:1 96:2 102:1 <b>total</b> 24:6 48:2 56:20 57:11,15 58:1,1,1,19 59:6 59:13 62:23,24 66:17 67:17,20 69:10 71:1,3,7 71:15 72:1,2,7 74:16 76:25 77:17 99:18,18 99:22 <b>track</b> 21:18 22:4 22:7 23:1 52:20 53:3,14 54:10,11 54:13 79:19,22 80:12 93:3 98:19 <b>tracking</b> 91:19 <b>tracks</b> 98:13 101:12,15 <b>transcribed</b> 109:11	<b>transcript</b> 107:8 107:10,13 109:12,14,16 110:6,8,10,13,13 110:21 111:2,2 112:3 <b>translation</b> 29:7 <b>treats</b> 32:20 <b>true</b> 109:12 112:5 <b>truth</b> 11:3,3,4 <b>try</b> 12:9 14:12 95:15 <b>trying</b> 30:25 35:13 42:8 72:20,24,25 81:23 84:15 <b>two</b> 10:4 23:22 26:24 27:19,24 29:12,20 37:17 38:21 41:10 42:21 45:15,15 47:11 67:13 68:3 70:21 79:25 100:24 <b>type</b> 46:5,8 72:17 74:10,12 74:23 <b>types</b> 33:12 <b>typically</b> 29:3 31:7 <b>typo</b> 85:10 <b>u</b> <b>uh</b> 90:14 <b>umbrella</b> 15:20 <b>unclear</b> 13:21	<b>understand</b> 12:13 13:15 14:5 20:15,16 31:1 32:23 33:9 36:21 45:17 51:7 66:2 77:11 78:23 83:7 86:4 88:19 92:9 101:22 104:3 106:20 <b>understanding</b> 27:8,23 58:9 85:25 86:15,22 101:20 <b>understood</b> 38:19 <b>unit</b> 15:15 <b>united</b> 1:1 2:1 <b>universe</b> 57:1 <b>unreasonable</b> 59:13 <b>upload</b> 18:25 24:17 40:5 41:19 43:4,10,14 44:10 87:19 89:22,24 96:17 96:23 97:4,4 <b>uploaded</b> 24:7 24:23,25 25:5 41:16 42:3 46:17 47:3 51:15 58:8 68:14 81:11,20 82:24 87:20,22 91:6 93:1,12 96:8,9,15,18 98:8,20,23	<b>uploader</b> 24:8 <b>uploading</b> 18:24 41:21,22 42:11 42:12,24 43:5,8 44:3,4 96:21 <b>uploads</b> 83:8,12 88:1,7,24 89:4 90:6 <b>use</b> 33:16 36:17 36:19 37:24 38:7 42:15 47:25 53:20 55:21 86:5,6 <b>user</b> 1:4 2:4 9:11 27:14,25 28:7,7 41:19 42:10 48:24 51:17 78:9 88:1,3,4,7 88:11 89:4,6,16 90:6 93:25 94:4 94:8 98:9,22,25 99:1 101:24 102:12,14,17,18 102:18,23,25 103:3,5,13,16 104:7 110:4 113:1 <b>user's</b> 91:17,18 91:19 <b>users</b> 13:11 25:6 27:7,9 48:8 49:13,17,22 50:16,19,22,23 58:8 72:15 78:10 79:15 80:4 88:13 89:1 89:1 92:6 94:11 94:16,22 98:3,7
---	--	--	---

HIGHLY CONFIDENTIAL

**[users - waste]**

98:19 99:15 102:19,20,21 <b>uses</b> 27:13 36:12	34:2 39:5 41:13 41:20 42:3,3,11 43:4 44:10,17 46:5,8,16,18 47:3,5 48:1,5,8,9 48:23 49:22 50:2,4,20,22,24 51:1,4,5,5,12,14 51:18 53:13 54:10 57:3,6,7 58:7 59:6 63:1,2 64:17,20 65:5,7 65:11,22,25 66:25 68:7,12 69:10,17 71:18 74:10,12,22,23 74:24 75:5,22 76:3,6,15,24 77:16 81:11 82:12,16,18,19 82:23 83:12,14 83:15,17 84:25 85:20 86:2,5,6,9 86:12,22,24,24 87:3,8,10,11,18 87:19,23,25 88:2 88:7,12,15,17,24 89:3,11,12,22 90:1,6,8,11 91:6 91:7,8,9,11,20 92:20,25 93:1,3 93:7,13,14,15,17 93:20,24 94:3,7 94:11,15,22 95:7 95:21,24 96:8,18 96:25 97:5,12,23 98:3,8,11,20,23 99:1,5,8,16,18	99:19,23 100:1,5 100:21 101:15 101:24 102:12 102:16 103:6,8 103:16,20 104:7 104:10 <b>videoconference</b> 1:14 2:19 3:2 4:2 5:2 6:2 10:18 <b>videographer</b> 6:25 9:6,12 10:6 10:7,9 41:4,7 84:18,21 101:6,9 106:14,17 108:7 <b>videos</b> 24:7,17 24:23 25:5 41:16 43:14 44:3,5 46:16 47:24 48:3,11,17 48:18 49:13,18 49:23 50:16 56:22,24 57:1,8 57:11,14,16 58:1 59:7,12 60:4 62:17 63:4 66:4 66:10 67:17,20 67:22,23,24 71:9 71:12,15 72:3,8 72:9,16 75:3,6 78:10 80:19 81:20 82:5,9,9 85:6,6,10,11,15 85:16,18 87:4 96:9,15 100:18 102:19,20,22 <b>view</b> 102:4	<b>viewed</b> 68:14 76:1 <b>viewer</b> 74:25 <b>viewers</b> 102:21 <b>views</b> 74:16,22 74:24,25 75:5 93:25 <b>vod</b> 47:4 <b>voice</b> 33:12 <b>volume</b> 1:17 7:3
<b>v</b>		<b>w</b>	
<b>v</b> 4:16 110:1 <b>vague</b> 31:12 32:4 35:17 38:15,23 49:3 50:14 51:10 53:5 76:9 76:19 77:9,19 78:11 79:11 87:2 98:12 <b>value</b> 62:10 78:12 82:18 <b>values</b> 46:10 47:11 61:23 62:7,16,20 64:13 74:4 <b>varied</b> 13:14 <b>variety</b> 75:21 91:3 <b>various</b> 76:2 <b>vc</b> 1:4 2:4 <b>verbiage</b> 42:14 <b>veritext</b> 9:13 110:7,9,11 <b>versus</b> 67:25 68:9 95:16 <b>vestige</b> 62:25 <b>vett</b> 29:12,12 29:15 <b>vetting</b> 30:15 <b>video</b> 1:14 2:19 10:3,4 13:8,9 24:2,5,22,25 27:3,4 30:6,7 31:24 33:22		<b>w</b> 3:7 6:16 <b>waiting</b> 18:19 <b>waived</b> 110:23 110:23 <b>waiving</b> 110:20 <b>want</b> 15:8,16 19:18 21:13 38:24 39:1,2 40:12 43:25 44:25 45:12 52:24 53:22 54:6,6 58:22 60:17 65:16 68:6 71:16 84:4 86:3 92:23 95:12,18 101:14 102:5,6,8 104:2 105:23 107:8,19 <b>wanted</b> 12:23 13:1 21:8 58:14 94:17 95:14 <b>wants</b> 83:13 <b>washington</b> 1:23 3:13 <b>waste</b> 19:18 52:24 92:23	

HIGHLY CONFIDENTIAL

**[waste - zoom]**

95:19 <b>wasting</b> 20:19 <b>watch</b> 47:20 48:8,8,23 49:1 49:14,19,21 50:17,19,21,23 51:19 52:2,9,17 52:21 53:14 54:11,14,16 55:4 55:12,16 72:18 79:8 81:3,6,17 88:13 89:1 94:25 98:3,7,19 99:15 103:10 <b>watched</b> 71:23 71:23 72:3 74:25 80:19 98:10,23 99:5,8 99:19,23 100:1 102:20 <b>watchers</b> 98:9 <b>watches</b> 51:18 99:1 <b>watching</b> 48:3 48:23 49:13,17 49:22 50:2,3,4,5 50:16,19,22,23 72:15 78:10 98:18 102:19 <b>way</b> 27:4 29:9 30:22 31:8,16 33:18 34:6,19 37:2 43:23 54:17 63:9,10,11 66:2,7,9 69:5 72:21 76:23 79:10 80:18 83:4,16 87:12	89:4 90:4 96:11 <b>ways</b> 29:12 43:10,11,13 44:10 76:5 87:24 88:1 <b>we've</b> 38:22 44:2 44:2,4 45:12 64:1 69:6 70:17 76:8 84:1 94:10 99:11,11 103:9 104:4 107:11 <b>web</b> 1:14 2:19 3:2 4:2 5:2 6:2 <b>went</b> 20:4 29:17 35:21 71:10,11 <b>whereof</b> 109:20 <b>wishes</b> 68:15,16 <b>witness</b> 9:14 21:10 22:15,23 53:17 83:20 91:22 94:10 105:7,19 107:12 107:20 109:20 110:13,16 111:2 111:5 <b>witnesses</b> 12:16 45:15 95:16 <b>wondering</b> 24:15 26:22 <b>word</b> 32:6 33:6 35:1,2 36:1 87:12 <b>words</b> 13:17 21:22,25 49:12 64:22 96:20 <b>work</b> 33:13 83:23 86:15	<b>works</b> 50:7 90:3 95:8 97:17 <b>world</b> 25:7 27:7 33:24 47:12,14 55:13 58:8 61:24 62:18 64:14 68:22,25 73:5 74:5 <b>worldwide</b> 27:9 58:10 <b>wow</b> 17:2 <b>wrong</b> 17:19 24:9 78:20 <b>wu</b> 16:1	<b>year</b> 24:8 46:3 46:17 48:1 56:18 61:18 62:17 64:9 66:22 67:1,4,15 67:23 70:23 73:25 74:22 80:5,23 81:24 <b>years</b> 17:1 23:24 27:1 30:8 51:24 <b>yin</b> 16:1 <b>yondy</b> 16:1 <b>york</b> 5:11,11
		<b>x</b>	
		<b>x</b> 7:1,8 8:1 109:16 <b>xx</b> 111:1	<b>yup</b> 45:6 56:19 71:20
		<b>y</b>	<b>z</b>
		<b>yeah</b> 10:10 15:11 18:21 25:21 30:19 31:15 33:9 39:9 40:20 40:24 46:15 55:2,15,17,19,24 56:7 58:16 59:23 61:21 62:23 67:4 69:17 70:22 73:1,1,1 74:20 75:9,11 78:1,3 78:21 79:8,12 82:14,19 84:13 88:6 91:15 94:23 95:23 102:3 106:3 107:9,24 108:3	<b>zoom</b> 1:12



Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS  
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at [www.veritext.com](http://www.veritext.com).